

Representor ID and details: 4195/DP1 Janet Thomas

Test CE1

There is no coherent strategy within the plan so policies and allocations do not logically flow.
The allocation of MG 9 site does not meet the objectives of being in a rural location with adequate facilities and transport.
The position of MG9 is very rural accessed only by a very narrow lane. It does not meet 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' - obviously the sites location could not meet this objective.

Objective 2

'To ensure that development within the VOG makes a positive contribution towards reducing impact of mitigating the adverse effects of climate change' - obviously with site location and dependence of cars this objective would not be met.

Objective 3

'To reduce the need for VOG residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport' - not met.

Objective 4

'To protect and enhance the VOG's historic, built and natural environment' - not met.

Objective 5

'To maintain, enhance and promote community facilities and services in the VOG' - the local school hasn't been consulted and doesn't have capacity for increased numbers. to be expected should development go ahead.

Objective 7

'To provide the opportunity for people in the Vale to meet their housing needs' - this states that development should be in sustainable locations - this site is not.

Objective 10

'To ensure that development within the VOG uses land effectively and efficiently to promote sustainable use and management of natural resources' - not met the land in question is agricultural land in a special landscape area - previously used for cattle.

Test CE2

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

1. Does not meet requirement of Policy MD12 - allocation of land purely on basis of site ownership.
2. Sustainable settlements appraisal states site score 0 for public transport however the site assessment states that this is good!! - obviously conflict in opinions.
3. Site assessment states 'good highway access' - obviously incorrect as lane is very narrow with no passing places and falls well short of minimum width requirements.
4. The Gypsy and Travellers site assessment does not reflect the current legal obligation of the council however other site assessment highlights legal issues.
5. Why were other privately owned sites which were put forward dismissed?
6. The site allocation does not reflect the need of the Gypsy and Traveller community (Fordham Report).
7. The site assessment states Fferm Goch as local settlement when Llangan is recognised historically at the local settlement and is much closer to the site than Fferm Goch.
8. No reference made to the fact that the site is in a special landscape area.
9. No reference made to the fact site is adjacent to conservation area and within conservation management plan there is a requirement to protect the view from the edge of conservation area over proposed site.
10. Questionable allocation of Fferm Goch as minor rural settlement. It scores 3 for employment - the same as Barry? - the units employ less than 15 people and no new jobs have been available in the last nine years.
11. Fferm Goch has a population of 98 - the guidance requires all sites with a population below 100 to be classified as a Hamlet - not a minor rural site.
12. VOG own study report confirms that isolated rural sites restrict access to health, education and welfare facilities that disadvantage them.
13. Welsh Government guidelines state that sites should be situated in close proximity to transport links. 'The Llangan site would not meet this criteria, being situated away from main transport infrastructure also the Llangan site would fail on having ready access to schools, doctors and shops. The lane would have to be widened which would change the environmental character of the area with the removal of well established hedges on either side.
14. The allocation of MG9 site would be totally inconsistent with the proposed policies.

Test CE3

Representor ID and details: 4195/DP1 Janet Thomas

Site management has not been considered in the proposal, also the current housing strategy expires next month and no reference has been made as to how the Gypsy and Traveller community will be monitored for growth.

Test CE4

1. Policy MD12 offers no flexibility for VOG to bring forward suitable sustainable sites.
2. The MD12 Policy should be redrafted to allow for smaller sustainable sites to be included within Affordable Housing requirements.

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

1. Policy MD12 should be amended so that all sites should be assessed in the same way as affordable housing so that there is no discrimination against the Gypsy and Traveller community.
2. Removal of site MG9 for an alternative site that has been assessed according to a relative sustainability appraisal.

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 necessary to speak at the hearing -

No Status

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

Representor ID and details: 4196/DP1 Mr Bufton

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. . .	MG9. Feb 2012

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	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/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.

TESTC2

Representor ID and details: 4196/DP1 Mr Bufton

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

Representor ID and details: 4196/DP1 Mr Bufton

- 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.

Representor ID and details: 4196/DP1 Mr Bufton

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 from 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'".

Representor ID and details: 4196/DP1 Mr Bufton

"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.

Representor ID and details: 4196/DP1 Mr Bufton

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 breaches 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 the 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"

No Status

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

Representor ID and details: 4197/DP1 Glenda Evans

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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2b - If you think that the Plan is unsound and does not meet one or more test(s) of soundness, please indicate which test(s) that it fails.

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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. 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 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):
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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: Land east of Llangan Site Reference: Site reference MG9/ 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.

TESTC2

Representor ID and details: 4197/DP1 Glenda Evans

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

Representor ID and details: 4197/DP1 Glenda Evans

- 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.

Representor ID and details: 4197/DP1 Glenda Evans

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 from 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'".

Representor ID and details: 4197/DP1 Glenda Evans

"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.

Representor ID and details: 4197/DP1 Glenda Evans

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 breaches 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 -

No Status

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

Representor ID and details: 4198/DP1 Malcom Evans

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
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 representation? Yes (If "No" or "Unanswered" - go to 3d)

3c - What changes would like to see made to the Deposit Plan?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/ 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.

TESTC2

Representor ID and details: 4198/DP1 Malcom Evans

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.

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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 from 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'".

Representor ID and details: 4198/DP1 Malcom Evans

"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

Representor ID and details: 4198/DP1 Malcom Evans

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 breaches 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 -

No Status

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

Representor ID and details: 4199/DP1 Mrs Eveline Fines

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
31/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(27).

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	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: Site Reference:

3e - Please set out your representation below:

I wish to file an objection to the proposed planning at the site of Aberthin, land adjoining Court Close. Site reference MG2(27).

Question 2a I feel the LDP is unsound

Question 2b on the consistency tests: under option C1 and also under the Coherence and Effectiveness Tests under option CE2.

Question 3b I wish to see changes made to the Deposit Plan.

Question 3c Deletion of site

Question 3d The site was submitted as a candidate site its reference is MG2(2) and the name is Land adjoining Court Close.

I feel the site proposed is unsuitable for the on the grounds of causing a negative impact to the surrounding envirmnt and community through the following points:

The lane which is the only access to Court Close is unsuitable to carry additional traffic, both in width and depth. There is no ground to widen this country lane. The quiet cul de sac which sits behind my house will become a through road.

Erosion has already increased to the bank in front of the houses numbers 5-8 Downs View, and the pavement which runs along the front of these houses is already slipping. How long until my house which is along this bank begins to slip due to the estimated high volme of traffic which will have to use the lane to access this development?

Hedgerows which currently channel this water will be removed to make way for this development. Adding to further flooding issues that occur during heavy rainfall, as the water will find the fastest downward route, surrounding houses will suffer, including Great House a grade II listed building.

There is the potential through the removal of trees, hedgerows and earth works needed to create footings and infrastructure, that ground slippage may occur.

The size of this proposed development is dis-proportionate to the area, the village will through this one development expand by a third, it will change the appearance and environment of the village in a negative way, and provides precedent to be set for future developments of this kind and size in this rural village. So this village will no longer be a small collection of houses in a rural area but an but an urban area with a surrounding countryside thusly becoming a town.

Representor ID and details: 4199/DP1 Mrs Eveline Fines

The infrastructure needed to accommodate 20 houses will have to be added to the current system. This will put pressure on the local sewers, and the already overworked sewerage plant at Cowbridge. Considering the other proposed developments in the area this plant will not be able to cope and additional funds will have to be found to update this plant.

The provision of "affordable housing" on which so much is being made is insufficient to the number of properties proposed. Out of 20 houses only 7 being affordable is an attempt to crowd developments into an area which in normal circumstances planning has been denied. Twice.

The local primary schools are already at capacity, how will they "expand" to allow additional children from the proposed developments to be educated?. The other services such as a regular bus service to allow people to commute to work are insufficient as the bus does not run after certain hours.

The A4222 is a very busy road which currently has to cope with heavy quarry lorries, large high sided private rubbish lorries, school buses, and through traffic. Most of these vehicles are fast moving and do not adhere to the 30mph speed limit. The entrance to Downs View is narrow and a 90 degree angle to turn left, and the turn to the right has an obstructed view. It is difficult to exit from C Downs View and sometimes hard to enter as the traffic moves so quickly. There is also no safe crossing point to the bus stop and to get to the tree bus stop you have to walk on the road as there is no pavement, as previously mentioned the traffic is heavy and fast making no consideration for pedestrians. This is terrifying if you have small children, or are elderly. There is no safe area to put a crossing due to the blind bend from Cowbridge.

Finally I am perplexed why this field would be considered a suitable site as it sits on a steep slope, has poor access, and must present issues when more straight forward sites are available. Surely a more straight forward site such as 2420/CS. I would have fewer issues as it sits near the main road, has space around it in which to accommodate a suitable road to allow ingress and egress to development. And does not affect a listed property.

Question 3f The changes I wish to see would like to see is the removal of the Court close site.

More time taken to consult and consider the appropriate nature of the locations, scale of the developments.
The impact that the proposed developments will have because not all will be positive

Question 4a

I do not want to speak at a hearing but am happy for my written comments to be considered by the inspector.

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

Question 3f The changes I wish to see would like to see is the removal of the Court close site.

More time taken to consult and consider the appropriate nature of the locations, scale of the developments.
The impact that the proposed developments will have because not all will be positive

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 -

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

Representor ID and details: 4200/DP1 Susan A Rees

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness 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. 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 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	Yes	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: Land East of Llangan Site Reference: Site reference MG9/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.

TESTC2

Representor ID and details: 4200/DP1 Susan A Rees

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

Representor ID and details: 4200/DP1 Susan A Rees

- 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.

Representor ID and details: 4200/DP1 Susan A Rees

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,"

"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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Representor ID and details: 4200/DP1 Susan A Rees

"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'"

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"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"

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"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."

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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.

Representor ID and details: 4200/DP1 Susan A Rees

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 breaches 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.
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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".

No Status

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

Representor ID and details: 4201/DP1 Alan M Rees

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 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 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	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/ 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.

TESTC2

Representor ID and details: 4201/DP1 Alan M Rees

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
- does not contribute to improvements in health due to the isolation from services and facilities.

Representor ID and details: 4201/DP1 Alan M Rees

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

Representor ID and details: 4201/DP1 Alan M Rees

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 from 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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Representor ID and details: 4201/DP1 Alan M Rees

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No Status

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

Representor ID and details: 4203/DP1 Antony John Vigar

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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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. 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 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	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/ 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.

TESTC2

Representor ID and details: 4203/DP1 Antony John Vigar

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
- does not contribute to improvements in health due to the isolation from services and facilities.

Representor ID and details: 4203/DP1 Antony John Vigar

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

Representor ID and details: 4203/DP1 Antony John Vigar

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 from 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'".

Representor ID and details: 4203/DP1 Antony John Vigar

"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

Representor ID and details: 4203/DP1 Antony John Vigar

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 breaches 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 -

No Status

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

Representor ID and details: 4204/DP1 Jane Jones

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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:
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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)

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Unanswered	Yes	Unanswered	Unanswered	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/ ID 22 Appendix 1

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

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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.
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TESTC2

Representor ID and details: 4204/DP1 Jane Jones

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- 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.
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- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 - evidence);
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- The LDP also states its vision as being:

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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

Representor ID and details: 4204/DP1 Jane Jones

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 from 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'".

Representor ID and details: 4204/DP1 Jane Jones

"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

Representor ID and details: 4204/DP1 Jane 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 breaches 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 -

No Status

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by Representation ID No.)

Representor ID and details: 4205/DP1 Mr M.Bolland

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Examination
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
MG2(7). MG2(10). MG12(12).	7.48.

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	Yes	Yes

Notes: Amendment to the constraints plan

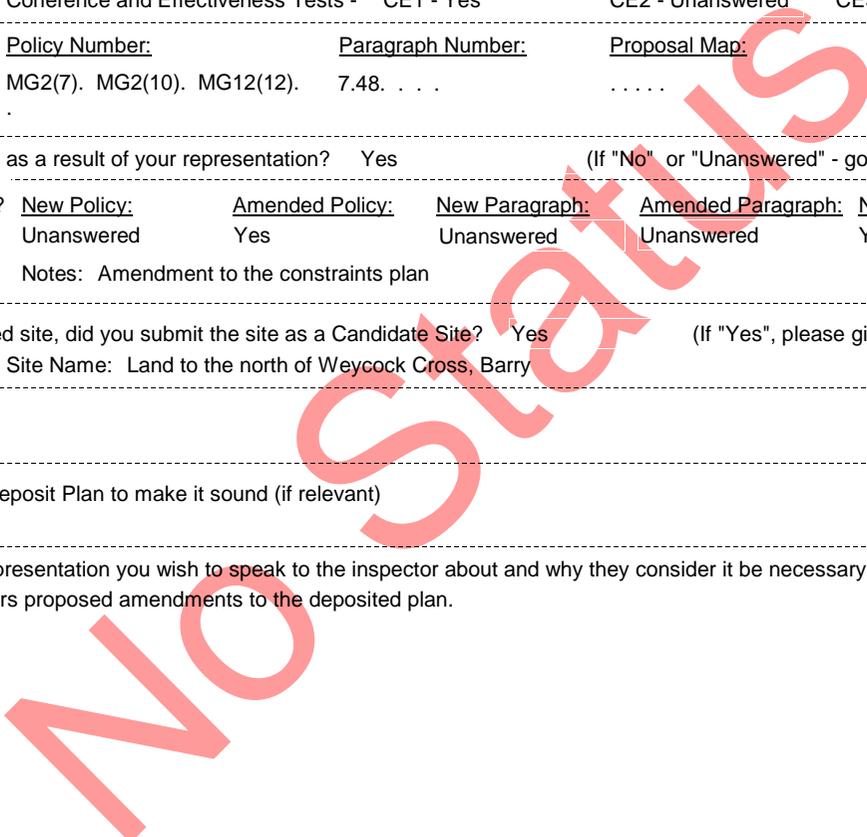
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land to the north of Weycock Cross, Barry Site Reference: MG 12 (12)

3e - Please set out your representation below:
See attached statement

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

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 -
To allow full and adequate consideration of the land owners proposed amendments to the deposited plan.



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

Representor ID and details: 4206/DP1 Barbara Barrett

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

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Procedural Tests -	P1 - Yes	P2 - Yes		
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?

Policy Number:	Paragraph 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 representation? Yes (If "No" or "Unanswered" - go to 3d)

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New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
Unanswered	Yes	Unanswered	Unanswered	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/ 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.

TESTC2

Representor ID and details: 4206/DP1 Barbara Barrett

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
- does not contribute to improvements in health due to the isolation from services and facilities.

Representor ID and details: 4206/DP1 Barbara Barrett

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."

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"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'".

Representor ID and details: 4206/DP1 Barbara Barrett

"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."

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"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

Representor ID and details: 4206/DP1 Barbara Barrett

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 breaches 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.
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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 -

No Status

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

Representor ID and details: 4207/DP1 Catharina Brackley

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 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 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	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/ 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.

TESTC2

Representor ID and details: 4207/DP1 Catharina Brackley

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
- does not contribute to improvements in health due to the isolation from services and facilities.

Representor ID and details: 4207/DP1 Catharina Brackley

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

Representor ID and details: 4207/DP1 Catharina Brackley

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 from 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'".

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Representor ID and details: 4207/DP1 Catharina Brackley

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No Status

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

Representor ID and details: 4208/DP1 Beth Jones

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
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Notes:

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Site Name: Land East of Llangan Site Reference: Site Reference MG9/ ID 22 Appendix 1

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

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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

Representor ID and details: 4208/DP1 Beth 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 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
- does not contribute to improvements in health due to the isolation from services and facilities.

Representor ID and details: 4208/DP1 Beth 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

Representor ID and details: 4208/DP1 Beth Jones

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 from 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'".

Representor ID and details: 4208/DP1 Beth Jones

"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

Representor ID and details: 4208/DP1 Beth 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 breaches 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 -

No Status

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

Representor ID and details: 4209/DP1 Ceri Jones

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness 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. 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 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	Yes	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: Land East of Llangan Site Reference: Site Reference MG9/ 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.

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2. The allocation of MG9 is not consistent with the proposed LDP policies.

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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

Representor ID and details: 4209/DP1 Ceri Jones

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-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.
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- 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.
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Representor ID and details: 4209/DP1 Ceri Jones

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-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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Representor ID and details: 4209/DP1 Ceri Jones

site will have entirely the opposite effect to this objective.

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- 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 from 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'".

Representor ID and details: 4209/DP1 Ceri Jones

"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

Representor ID and details: 4209/DP1 Ceri 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 breaches 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 -

No Status

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

Representor ID and details: 4210/DP1 Mr Steven Shepherd

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Comment form	Examination

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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:
49.

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	Yes	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: Land to the rear of Tuar Gaer and White Gables and Land at Pwll Sarn, St Site Reference: The new candidate site forms part of the

3e - Please set out your representation below:

In essence our representation is that a new site (the details of which are set out in the attached Appraisal Form) be added to list of housing allocations in policy MG2 under the heading St Nicholas. We are making separate representations in relation to the current allocation under MG2(33).

In relation to the site referred to in the attached Appraisal Form we submit that it represents a site for residential development which will meet the Council's objectives and policies as outlined in the draft LDP.

It will be seen that the proposed site is bounded on three sides by the existing development of St Nicholas and represents development that can properly be regarded as a rounding off and infill and related to the existing settlement. The site has a distinct physical relationship with the existing settlement and cannot be regarded as sporadic development in the countryside. The development can be accommodated without an unacceptable impact on the existing settlement because its scale form and character will be sympathetic to the immediate surroundings and wider area. It will not be visually intrusive and will not affect the Duffryn ridge line. This should be contrasted with the proposed residential development site (Housing Allocation MG2 (33)) to the east of St Nicholas which is bounded on two sides by open countryside. That proposed development would be unrelated to the village of St Nicholas creating a separate enclave bearing no relationship to the village save its proximity. That proposal represents further linear development along the A48 promoting coalescence between St Nicholas and the Downs rather than a rounding off or infilling and will be visually intrusive into the open countryside.

The applicants believe that the site can be developed for high quality dwelling units with relatively spacious plots sympathetic to the surrounding properties, protecting their amenity and respecting the landscape. Any development of the land would not adversely affect the St Nicholas Conservation Area. In particular there would be no effect on the historic buildings in the Conservation Area (that is to say the listed buildings or the unlisted 'positive' buildings identified by the Council as enhancing the area). The site is well away from the listed buildings of the Church, the Smiths Cottages, the Village Hall, Hall House and the Three Tuns. It is separated from the Presbyterian Church by the existing development of the properties known as Tarquin and Old Hedges. With careful and sympathetic design the development would enhance the existing more modern buildings abutting the site which are within or adjoining the Conservation Area. The development would respect and improve the setting of Pwll Sam by removing any unsightly modern outbuildings and where possible, by putting existing buildings of architectural merit and which are structurally sound, into beneficial use as part of the development. It is the quality of design and layout in an area such as this that is important and this site offers an ideal location for a development which meets planning policy objectives and which can marry in with and enhance the existing development. The Council has recognised this fact by approving the modern houses to the west of the site, the creation of a high wall in front of the Three Tuns regarded as a key building within the Conservation Area and the construction of the gated development known, as Mawsons Mead.

The development of the site for residential development can meet draft policies SP 3, SP4, MG 1 and MG7. St Nicholas is identified in the draft LDP as a sustainable minor rural settlement which has the capacity to accommodate some additional development without it having an unacceptable effect on its character. The site can accommodate a mix of housing tenures including affordable housing and the existing services and facilities are readily

Representor ID and details: 4210/DP1 Mr Steven Shepherd

accessible from the site. It abuts the A48 which has footways on both sides at this point, is within 100m of an extant bus stop and is proximate to a number of footpaths. The site is thus easily accessible to local services /facilities by public transport, walking and cycling. The development of the site can benefit from the existing infrastructure or where new infrastructure has to be provided it can be provided without any unacceptable effect on the natural or built environment.

The site is currently accessed through Pwll Sarn at the junction of the existing side road adjoining the A48 and through White Gables. The site has a frontage onto the A48 which is of sufficient length to accommodate an access/egress which would meet current highway standards. The applicants intend (subject to consent) that a new access be formed and located further west from current access at Pwll Sarn, directly onto the A48 where it can be created with a visibility splay allowing for a stopping sight distance which meets the standards set out in Annex B of Technical Advice Note (TAN) 18: Transport (2007).

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 -

We wish to reserve our position as to whether to speak at the Hearing since we are submitting a new site and are not able to respond to and test the Council's recommendations in response to this proposal at this stage. We wish to address the Inspector on the merits of and to ask questions upon the Council's response.

No Statutory

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

Representor ID and details: 4211/DP1 Alun John

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(11).

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	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: Site Reference:

3e - Please set out your representation below:

Cowbridge Chamber of Trade represents the views of the traders who operate in Cowbridge, including retail, restaurants, service companies and others.

Following consultation with the membership of the Chamber of Trade and with the full agreement of our membership we want to raise three main areas of concern in relation to the proposed LDP.

1. The negative impact of the LDP on available parking in Cowbridge and the subsequent effect this will have on traders.
2. The likely increased strain on an already overstretched infrastructure.
3. The threat to the character and uniqueness of Cowbridge and the direct effect this will have on visitor numbers and tourism.

The following sections explore these points in more detail:

1. The cattle market provides invaluable parking space for the town, with which many people would find the frustrations of parking a deterrent to using the town's facilities. The proposed redevelopment of the cattle market would involve the loss of open space, community and tourist facilities, and impact directly on traders. Sufficient accessible parking is essential to enable the prosperity of the town.

Less parking = less visitors/shoppers

Repeated surveys of parking in Cowbridge have shown that there is already a significant problem with the lack of parking and that this deters visitors/shoppers. Currently visitors have limited parking options; the town hall car park, the existing cattle market site; limited number of 1-hour slots along the High Street and a few private car parks. The newly developed Health Centre has about 70 spaces; however it is for the sole use of the Health Centre Mon-Fri and shut off on weekends.

Car parking is of the utmost importance to the success of Cowbridge as a community and a visitor destination Visitors provide £108 million pound spend in the Vale each year. There are in excess of 100 SMEs in Cowbridge most of them rely, fully, or in part on this spend without which many of them would not survive.

The redevelopment of the cattle market site into housing and the subsequent loss of car parking spaces relate directly to point 7.31 of the LDP. Such a redevelopment would clearly be a loss of facilities. We do not believe the Council is able to demonstrate that these parking facilities are no longer required.

LDP Ref: 7.31

"Where proposals involve the loss of open space, community or tourist facilities the Council will require robust evidence that demonstrates the facilities are no longer required. Such evidence could include

Representor ID and details: 4211/DP1 Alun John

information in respect of the availability of open space within the area against relevant standards"

2. The likely increased strain on an already overstretched infrastructure.

We are seriously concerned that the LDP poses an unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking.

Extra housing in the town would create an added strain on an already overburdened infrastructure. (There are already extra housing proposed on sites such as the old lower school, the old 6th form and the police station). Typical households have 2 cars and so any future housing developments will mean significant increase in local traffic. The roads within Cowbridge are already at capacity and cannot absorb more use. Previous development proposals have looked at the scope for cycle lanes and this has proved difficult without losing even more parking. (This latter point has been researched on a previous occasion when a large development was proposed for the fields on the Llantwit Road. Both the housing and cycle lanes were proven to be untenable).

Traffic congestion is greatly exacerbated in Cowbridge as the Westerly bypass has only one exit. This forces all traffic for the town and for the surrounding area to the west and south of Cowbridge to have access to their destination via the high street to a halt on a regular basis. This includes extremely large lorries making their way to Llandow Industrial Estate.

The following policy extract supports the above points:

LDP REF: policy mg6 – residential development in key, service centre and primary settlements. The service centre settlements of Cowbridge

NEW DEVELOPMENT WITHIN THESE SETTLEMENTS WILL ONLY BE PERMITTED WHERE THE PROPOSED DEVELOPMENT:

WOULD NOT PREJUDICE THE DELIVERY OF AN ALLOCATED DEVELOPMENT SITE;

IS OF A SCALE AND FORM THAT IS COMMENSURATE WITH THE SURROUNDING AREA AND DOES NOT UNACCEPTABLY IMPACT UPON THE CHARACTER AND APPEARANCE OF THE LOCALITY;

WOULD NOT RESULT IN THE LOSS OF PUBLIC OPEN SPACE, COMMUNITY OR TOURISM BUILDINGS OR FACILITIES AND

HAS NO UNACCEPTABLE IMPACT ON THE AMENITY AND CHARACTER OF THE LOCALITY BY WAY OF NOISE, TRAFFIC CONGESTION AND PARKING.

3. The threat to their character and uniqueness of Cowbridge and the direct effect this will have on visitor numbers and tourism.

The uniqueness of Cowbridge is of paramount importance to the value of the Vale as a tourist/visitor destination. The individual shops are already struggling for survival not least because of the dramatic rise of business rates in recent years and high rental costs. Every effort needs to be made to retain the charm and individualism of the town whilst encouraging day and stay tourists to visit. Parking/easy access is essential to support this.

The tourism industry is one of the largest contributors to the Vale of Glamorgan's economy, with as much as £180m being brought into the area each year. Cowbridge is at the heart of this spend and considerable carrot for getting visitors to the Vale as a whole.

We must ensure that changes in Cowbridge serve both the community and visitors. These two entities are inextricably linked and may residents and planners do not seem to realise how dependent our shops and services are on the visitors who visit Cowbridge.

A town without easy parking, without individual shops, good restaurants and lively pubs will not attract spend. Cowbridge is a town with history, a heart and a fragile uniqueness that we risk at our peril.

The following policy extract supports the above point:

Policy MG6

5. New development within Cowbridge will only be permitted where the proposed development: has no unacceptable impact on character of the locality by way of noise, traffic congestion and parking.

In summary, parking is essential to the survival of Cowbridge as a community and visitor destination. The redevelopment of the cattle market without supplying an equal or greater number of accessible parking spaces for town users is not acceptable. An increase in residents will place too great a burden on an already overstretched infrastructure. Lastly, it is vital that the character of Cowbridge is preserved. The LDP is an opportunity to safeguard the future of Cowbridge for the next 15 years and to support its growth and success. The chamber of Trade believes the current proposals would achieve the exact opposite and be

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4211/DP1 Alun John

detrimental to the future of this unique market town.

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 -

No Status

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

Representor ID and details: 4211/DP2 Alun John

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Examination

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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(11). MG2(15). . .	7.56. MG2 (11)

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	Yes	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: (a) Cowbridge Cattle Market, (b) Cattle Market, Cowbridge Site Reference: (a) 178/CS1, (b) 2252/CS4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (ref 2).

This parking represents 45% of the 446 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG2 (11) allocates this 0.87ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed Town Walls". The area allocated for this extra parking in the Council development brief could accommodate 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity).

Cowbridge town has a population of 3616 (2001 census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

Representor ID and details: 4211/DP2 Alun John

LDP Section 4 Vision and Objectives paragraph 4.3 states:

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan"

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in deposit LDP Policy MG2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011 by DRS Harris)

(ref 2) Consultation information on Parking in Cowbridge (2005, rev 2012) by C.A Pearce and D.R. Williams, Cowbridge and Llanblethian Residents Group.

(ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C.A. Pearce and D.R. Williams

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

Delete Policy MG2 (11)

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 -

As chair person of the Chamber of Trade I feel our opinion on the devastating impact the sale of this site would have is essential for the council to make an informed decision on the future of the site and its impact on the town as a whole.

No Status

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

Representor ID and details: 4212/DP1 J.M.Thorne

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(19).

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	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: Site Reference:

3e - Please set out your representation below:
VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN 2011-2026

1. I am submitting the following comments on the local development plan for the Vale of Glamorgan.
 - a) Paragraph 7:29 of Policy MG 6 (Residential Development in Key Service Centres and Primary Settlements) states that the new developments within these settlements will only be permitted where the proposed development:
 - i) is of a scale and form that is commensurate with the surrounding area and does not unacceptably impact upon the character and appearance of the locality;
 - ii) would not result in the loss of public open space;
 - iii) Has not unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking.
2. For the following reasons, I suggest that the proposal that 340 houses be built at Dinas Powys St. Cyres Annexe Site, Murch Road [MG 2:(19)] does not satisfy these criteria:
 - a) The proposed development site is largely a greenfield area (a school playing field, other fields and woods). The replacement of this rural environment by a large housing estate would completely alter the nature of the area. In other words it would have 'an unacceptable impact upon the character and appearance of the locality' and would 'result in the loss of public open space'.
 - b) Access to the proposed settlement is inadequate. Neither Murch Road, Murch Crescent nor Windyridge were constructed to accommodate the heavier traffic flows which would result from the building of 340 additional houses. Fire Service officers have already warned that roadside parking in Windyridge would hinder the passage of fire engines responding to an emergency.
 - c) The greatest impact would be on traffic through Dinas Powys. The main highway (A 4055) is already overloaded and congestion at peak hour is intolerable. Around 75% of Dinas Powys residents travel to work by car or van. (Source: Office of National Statistics). The Vale of Glamorgan Unitary Development Plan itself points out that the continued growth in private car use cannot be sustained indefinitely. Thus, the increase in road traffic levels as a result of proposed developments in Dinas Powys as well as in Barry would have 'an unacceptable impact on the amenity and character of the locality by way of noise and traffic congestion'.
 - d) Of particular concern is the likely effect on levels of pollution. In 2008, the Local Area Report: 'Info Base Vale' showed the indicator data for air quality in LSOA areas of Dinas Powys 1 and Dinas Powys 2 to be 99 and 100 respectively. (Source: Welsh Government). On a single score of between 0 and 100, 0 represents very good air quality and 100 represents very poor air quality.
 - e) Finally, it is clear that the proposed development would place increasing demands on already over-stretched local services such as schools and medical provisions.

Conclusions
The existing infrastructure is not adequate to meet needs arising from the proposed development. If the proposed plan is implemented, the local environment would suffer and the quality of life of residents would be undermined. Given that insufficient consideration has been given to highway and access issues relating to the site allocation, I recommend that the proposed site [MG2: (19)] be deleted from the deposit local

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4212/DP1 J.M.Thorne

development plan.

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 -

No Status

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

Representor ID and details: 4213/DP1 Richard Morgan, Watts & Morgan

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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):
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Notes:

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Site Name: (a) - Cowbridge Cattle Market, (b) Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

3e
The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4213/DP1 Richard Morgan, Watts & Morgan

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4214/DP1 Neil & Amanda Moaksom

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Yes CE4 - Yes

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
60. 113. . .	7.56. MG2(11)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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Notes:

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4214/DP1 Neil & Amanda Moaksom

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4215/DP1 Emily Osborne

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

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Procedural Tests - P1 - Unanswered P2 - Unanswered

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Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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)

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New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
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Notes:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4215/DP1 Emily Osborne

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Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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No Status

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

Representor ID and details: 4216/DP1 Claire Gallagher

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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3a - Which part of the Deposit Plan are you commenting on?

Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
60. 113. . .	7.56. MG2(11)

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)

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Notes:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4216/DP1 Claire Gallagher

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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Changes I wish to see made to the Deposit Plan to make it sound

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No Status

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

Representor ID and details: 4217/DP1 Peter John

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
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Notes:

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
LDP Section 4 Vision and Objectives paragraph 4.3 states:

Representor ID and details: 4217/DP1 Peter John

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref 2) Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4218/DP1 Dr J R Ayres

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

3e

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4218/DP1 Dr J R Ayres

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref 2) Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4219/DP1 Julie Huddart

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

3e
The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
LDP Section 4 Vision and Objectives paragraph 4.3 states:

Representor ID and details: 4219/DP1 Julie Huddart

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref 2) Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4220/DP1 Russell Heath

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

3e
The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4220/DP1 Russell Heath

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref 2) Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4221/DP1 Lisa Robinson

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
M	<input type="checkbox"/>	0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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(11). MG15. . .	7.56. MG2(11)

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	Yes	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: (a) Cowbridge Cattle Market, (b) Cattle Market, Cowbridge Site Reference: (a) 178/CS1, (b) 2252/CS4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and visitors and shoppers as an informal car park with 200 space capacity (ref 2).

This parking represents 45% of the 446 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG2 (11) allocates this 0.87ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed Town Walls". The area allocated for this extra parking in the Council development brief could accommodate 25-30 spaces, involving the net loss to the town of 170-175 spaces (26-27% of the total long stay capacity).

Cowbridge town has a population of 3616 (2001 census) and with Llanblethian 4100. The size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

Representor ID and details: 4221/DP1 Lisa Robinson

LDP Section 4 Vision and Objectives paragraph 4.3 states:

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan"

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in deposit LDP Policy MG2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011 by D.R.S. Harris)

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

Delete Policy MG2 (11)

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 -

As I am a new business I am already struggling as there aren't as many people coming to the town due to being restricted on parking facilities and many people complain that want to shop but can never find a parking space unless you drive around for hours! We need more parking facilities not reducing the ones that we have otherwise you will be driving people to shop elsewhere.

No Status

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

Representor ID and details: 4222/DP1 Nicholas Marley

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

3e
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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
LDP Section 4 Vision and Objectives paragraph 4.3 states:

Representor ID and details: 4222/DP1 Nicholas Marley

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref 2) Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4223/DP1 K Hughes

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

3e
The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed. LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4223/DP1 K Hughes

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref 2) Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4224/DP1 Curves

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

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This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4224/DP1 Curves

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4225/DP1 Alison Williams

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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)

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3e - Please set out your representation below:

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

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The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4225/DP1 Alison Williams

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4226/DP1 K Fox

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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):
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Notes:

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This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4226/DP1 K Fox

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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Changes I wish to see made to the Deposit Plan to make it sound

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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 -

No Status

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

Representor ID and details: 4227/DP1 Mark Jones

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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)

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New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
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Notes:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4227/DP1 Mark Jones

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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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 -

No Status

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

Representor ID and details: 4228/DP1 Awen Evans

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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3a - Which part of the Deposit Plan are you commenting on?

Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
60. 113. . .	7.5. MG2(11)

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)

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New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
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Notes:

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The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4228/DP1 Awen Evans

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4229/DP1 Claire Collins

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4229/DP1 Claire Collins

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Poliucy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4230/DP1 Susan Teesdale

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	Unanswered

Notes:

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Site Name: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4230/DP1 Susan Teesdale

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4231/DP1 Mr Stephen & Mrs Katherine Sims

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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). MG2(25). MG2(21). MG2(17).

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	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:	Site Reference:

3e - Please set out your representation below:

We wish to express our opposition to the proposed housing developments around Penarth and Sully in the Local Development Plan (LDP), in particular those at:

- Fort Road, Lavernock – MG 2 (16);
- West of Swanbridge Road, Sully – MG 2 (25);
- South of Llandough Hill/Penarth Road – MG 2 (21); and
- adjoining St. Joseph's School, Sully Road – MG 2 (17).

We do not believe the local infrastructure is capable of withstanding these extra developments and the LDP does not include infrastructure improvements compatible with these proposed developments.

Of particular concern are the transport links where it is already difficult to get out of Penarth in the mornings. At present it can take up to half an hour to get to the traffic lights at the Merry Harrier junction from the Cefn Mably pub and additional housing will result more traffic and more delays. There are no alternative routes, as all roads out of Penarth lead to the same few junctions. Section 5.63 of the LDP notes that even if the A4055 Dinas Powys By-Pass went ahead (which seems very unlikely) the problems at "the Cogan Spur and Merrie Harrier Junctions would be difficult to overcome".

The local schools are already very full and, looking back over past developments in the area, new schools were not built to allow for expansion in pupil numbers. This meant that Evenlode Primary School, for example, had to cope with many extra children from new houses around Cosmeston Drive and more recently Caversham Park. There are now about 500 children in a school that was built for far fewer pupils. The LDP does not appear to include expansion to local schooling commensurate with the proposed housing development.

Other local services, such as doctor's surgeries, already appear to be near their limit with patients having to wait a fortnight for non-urgent appointments.

We hope that you will take notice of our concerns, and reconsider your plans for the Penarth, Sully and Dinas Powys area.

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 -

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

Representor ID and details: 4232/DP1 Mr John & Mrs Tina Harris

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
31/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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	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: Site Reference:

3e - Please set out your representation below:
 Re: Vale of Glamorgan Deposit Local Development Plan 2011 — 2026

We refer to the above plan and would like to bring to your attention the following observations and concerns:

As residents of Dinas Powys we are concerned regarding the implications that the proposed additional housing would have on the Village. We understand that the proposal includes a minimum of 400 additional houses on the St Cyres annexe and Caerleon Road. Both sites are in close proximity to our home in Windyridge and would I assume be accessed via Murch Road. This being the case, the extra traffic this will bring (an additional 600 to 800 cars) will make leaving our home via Murch Road intolerable. This would then impact on traffic along Cardiff Road, as far as the Merry Harriers. We are already at a stage now when we have to consider the best times to leave the village due to the heavy traffic. We both use public transport to take us to work in Cardiff as the traffic is extremely heavy leaving and entering the Village at peak times.

We feel that a better proposal for the St Cyres site would be to include amenities for the local community, such as a leisure centre (with a swimming pool) which would benefit all ages and also a new doctors' surgery.

If these extra houses have to go ahead, it is essential that major changes to the current infrastructure are in place before any planning permission is considered. This being the case, any plans should also include amenities that would benefit the current residents.

We look forward to receiving your reply at the earliest opportunity.

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 -

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

Representor ID and details: 4233/DP1 Arboreal

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

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Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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)

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New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
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Notes:

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3e - Please set out your representation below:

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This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4233/DP1 Arboreal

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4234/DP1 Colours

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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3a - Which part of the Deposit Plan are you commenting on?

Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
60. 113. . .	7.56. MG2(11)

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)

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The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4234/DP1 Colours

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4235/DP1 Dr Simon O'Donovan

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
12/04/1931	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(23).

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	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: Site Reference:

3e - Please set out your representation below:

The development of additional houses north of the railway line should not be allowed.

This is green belt land and it's loss would be criminal.
The pleasant approach to the Point, view etc would be lost and more importantly wildlife ancient paths etc lost. How tragic!

Can the village roads schools GP practice etc really cope with an additional 600+ houses? Where is the infrastructure that was supposed to be built with the original development?

It's only this last month the roads have been swept! Terrible indictment on the Vale Council.

Build shops and housing etc on the land by the railway car park. Fine. Build housing GP practice nursing home on the vacant land South of the railway line. Fine. We all expect that and hope to benefit from a local shop etc. But if the massive development bigger than the current estate goes ahead we're off. It'll be a building site for years.

The drains and sewerage system can barely manage with the population already here! Please register my strongest objection.

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 -

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

Representor ID and details: 4236/DP1 VIP Dental

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) -178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4236/DP1 VIP Dental

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4237/DP1 Dogs Trust

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4237/DP1 Dogs Trust

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4238/DP1 Mr John Payne

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
31/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(11).

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	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: Site Reference:

3e - Please set out your representation below:

I wish to register my protest against the proposal that the Site of the Cowbridge cattle market be redeveloped for housing.

This site should remain a cattle market, as currently designated, because:-

1. It provides essential facilities for the local farming community to trade in the heart of the rural community in the Vale of Glamorgan, and it helps maintain the character of Cowbridge as a market town. Its loss would result in local livestock being forced to suffer unnecessarily long and stressful travel to other distant venues.
2. On days other than market days it provides parking facilities for approximately 200 cars, without which the High Street trade would diminish greatly, no doubt resulting in the closure of many of the specialist shops and restaurants which currently act as a magnet for visitors to this attractive town.
3. The loss of trade, resulting from insufficient parking facilities, would in time lead to a decaying High Street, full of Charity shops, run down and unattractive, as has been witnessed in so many rural towns throughout the UK.
4. The responsibility for destroying what is currently the nicest High Street in the Vale, (and possibly in the whole of South Wales) would lie fairly and squarely with the decision of the planners in the Vale. The local population will not forgive such an irresponsible act of vandalism.
5. I have only today become aware of this proposal, and it is clear that adequate consultation with the local population on this very important and potentially damaging proposition has not yet taken place, and without prior proper consultation the Cattle Market should not be designated for any other use. The population of Cowbridge and its surrounding villages must be given chance to express its opinions, and those opinions should be acted upon by the Council who are elected by us to serve the best interests of the Vale and its residents.

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 -

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

Representor ID and details: 4239/DP1 Karen Ingram

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4239/DP1 Karen Ingram

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4240/DP1 Ms Barbara M.Grigg

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Llangan Site Reference: Site reference 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).

Representor ID and details: 4240/DP1 Ms Barbara M.Grigg

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;

Representor ID and details: 4240/DP1 Ms Barbara M.Grigg

- 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

Representor ID and details: 4240/DP1 Ms Barbara M.Grigg

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 from 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 reclassified 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,”

Representor ID and details: 4240/DP1 Ms Barbara M.Grigg

"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.

Representor ID and details: 4240/DP1 Ms Barbara M.Grigg

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 breaches 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 -

No Submission

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

Representor ID and details: 4241/DP1 Richard Gibson

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4241/DP1 Richard Gibson

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4242/DP1 Graham Cartwright

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4242/DP1 Graham Cartwright

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Delete Policy MG 2(11)

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No Status

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

Representor ID and details: 4243/DP1 Victoria Baker

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

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This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4243/DP1 Victoria Baker

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4244/DP1 Tom & Jean Hunt

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
31/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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 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	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)

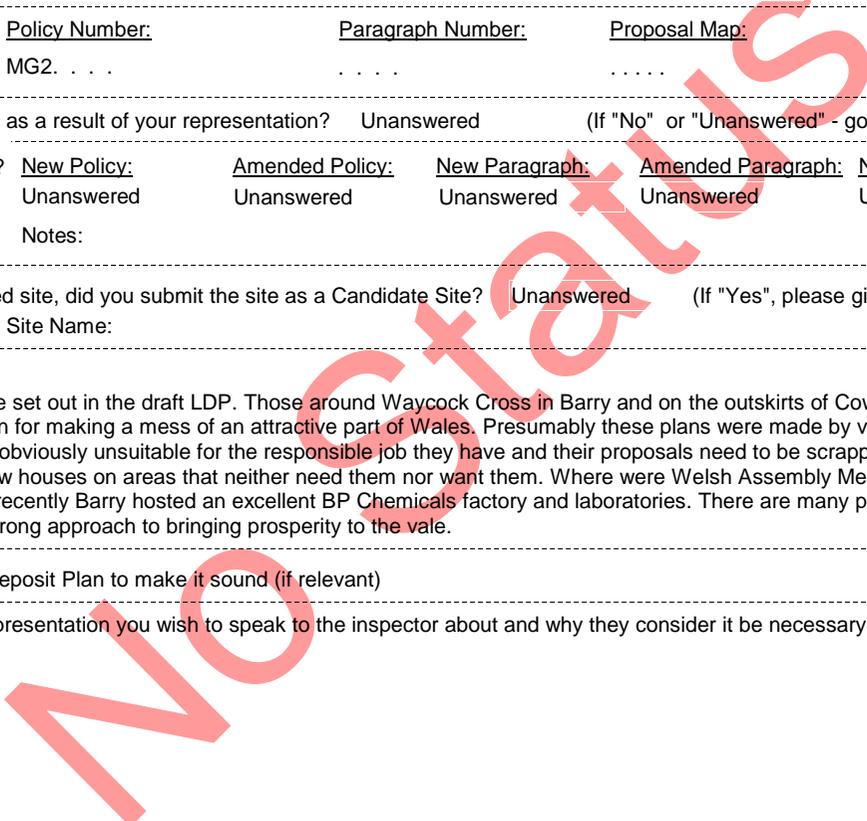
Site Name: Site Reference:

3e - Please set out your representation below:

I am appalled by the proposals for new housing in the vale set out in the draft LDP. Those around Waycock Cross in Barry and on the outskirts of Cowbridge are all in green field sites. If proposals for the rest of the vale are similarly ill considered, we have a master plan for making a mess of an attractive part of Wales. Presumably these plans were made by vale planners. I thought vale councils were elected to look after the best interests of vale citizens. These people are obviously unsuitable for the responsible job they have and their proposals need to be scrapped. It would be more sensible to attract the right sort of employers to the vale before inflicting vast numbers of new houses on areas that neither need them nor want them. Where were Welsh Assembly Members when the just announced decision to build a new Glaxo complex in Ulverston was being considered? Until recently Barry hosted an excellent BP Chemicals factory and laboratories. There are many people in the Barry area with suitable experience for such employment. Lining the pockets of housebuilders is the wrong approach to bringing prosperity to 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 -



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

Representor ID and details: 4245/DP1 Strawberry Fields

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, Cowbridge, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252./CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4245/DP1 Strawberry Fields

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4246/DP1 Claire Anthony

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	Unanswered	Unanswered	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

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This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4246/DP1 Claire Anthony

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4247/DP1 Mr Robert Wheatcroft

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Llangan Site Reference: Site reference 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).

Representor ID and details: 4247/DP1 Mr Robert Wheatcroft

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;

Representor ID and details: 4247/DP1 Mr Robert Wheatcroft

- 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

Representor ID and details: 4247/DP1 Mr Robert Wheatcroft

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.
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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.
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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,”

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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'".

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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.
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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 breaches 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 -

No Submission

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

Representor ID and details: 4248/DP1 Ms Susan Wheatcroft

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Llangan Site Reference: Site reference 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.

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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 breaches 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 -

No Submission

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

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
M	<input type="checkbox"/>	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Unanswered	C2 - Yes	C3 - Yes	C4 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (ID 30); Residential allocations table (page 145); Housing Supply Background Paper (November 2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

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 previously-developed 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

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

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 P1 - 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

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

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 106 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 Lliidiard/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

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

- 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 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

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

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

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

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 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.

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

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 Hamlets/Rural 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 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.

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.

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

- 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)

Representor ID and details: 4249/DP1 Mrs Michelle Siebert

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

No Status

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

Representor ID and details: 4249/DP2 Mrs Michelle Siebert

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Unanswered	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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
MG9. MD12. MG2. .	6.49. 6.52. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	Yes	Unanswered
<u>Notes:</u>					

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 East of Llangan Site Reference: Site reference 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).

Representor ID and details: 4249/DP2 Mrs Michelle Siebert

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;

Representor ID and details: 4249/DP2 Mrs Michelle Siebert

- 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

Representor ID and details: 4249/DP2 Mrs Michelle Siebert

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 from 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 reclassified 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,”

Representor ID and details: 4249/DP2 Mrs Michelle Siebert

"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.

Representor ID and details: 4249/DP2 Mrs Michelle Siebert

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 breaches 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 -

No Submission

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

Representor ID and details: 4250/DP1 Dr Stefan Siebert

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
M	<input type="checkbox"/>	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (ID 30); Residential allocations table (page 145); Housing Supply Background Paper (November 2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

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 previously-developed 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

Representor ID and details: 4250/DP1 Dr Stefan Siebert

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 P1 - 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

Representor ID and details: 4250/DP1 Dr Stefan Siebert

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 106 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 Lliidiard/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

Representor ID and details: 4250/DP1 Dr Stefan Siebert

- 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 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

Representor ID and details: 4250/DP1 Dr Stefan Siebert

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

Representor ID and details: 4250/DP1 Dr Stefan Siebert

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 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.

Representor ID and details: 4250/DP1 Dr Stefan Siebert

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 Hamlets/Rural 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 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.

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.

Representor ID and details: 4250/DP1 Dr Stefan Siebert

- 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)

Representor ID and details: 4250/DP1 Dr Stefan Siebert

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

No Status

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

Representor ID and details: 4250/DP2 Dr Stefan Siebert

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
13/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Llangan Site Reference: Site reference 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).

Representor ID and details: 4250/DP2 Dr Stefan Siebert

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;

Representor ID and details: 4250/DP2 Dr Stefan Siebert

- 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

Representor ID and details: 4250/DP2 Dr Stefan Siebert

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 from 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,”

Representor ID and details: 4250/DP2 Dr Stefan Siebert

"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.

Representor ID and details: 4250/DP2 Dr Stefan Siebert

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 breaches 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 -

No Submission

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

Representor ID and details: 4251/DP1 Mr John Saal

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Unanswered	C2 - Yes	C3 - Yes	C4 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (30); Residential allocations table (page 145); Housing Supply Background Paper (November2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

3e - Please set out your representation below:
Please see attached representations.

I have serious reservations regarding the proposal of 40 new houses being given planning permission at Fferm Goch. This concern stems from my belief that the area does not sufficiently accommodate the need of these extra housing developments due to how it will have a detrimental impact upon the environment. I greatly oppose the proposal by the LDP to increase from an agreed 12 houses to 40 since no initial consultation has taken place with those residing in the nearby area and the implications of such housing.

There are many examples in the LDP proposal that have discrepancies with its baseline assessments in regards to the areas sustainability. Planning Policy Wales (2011) is actively being breached on numerous counts with this proposal at the site. The Garden Emporium site has been defined as being totally unsustainable because the increase in population would result in additional pressure on local resources. It has been duly noted that Llangan Primary School does not have the capacity to accommodate the estimated 15 child places that would be required from a site containing 40 residential properties. This will mean that pupils will have to attend a school that most likely would be practically inconvenient for their parents/carers to travel to each day.

Any residents occupying these new houses will inevitably be required to have their own form of transport since public transport is extremely limited. This completely goes against recommendations in PPW which emphasise that housing developments "should be encouraged near public transport nodes or near corridors well served by public transport." On the subject of transport, the Highways Department has expressed concern at the proposal of there being more than one entrance/exit to the site with just the 12 houses. No figure has been given as to how many would be needed with 40 which ultimately will disrupt the rural environment and the need to maintain a rare plant (Bithynian Vetch) within it. Fferm Goch has been incorrectly classified as a minor rural settlement and decisions by the council in the past have consistently rejected similar building plans due to poor infrastructure and employment opportunities.

I live 0.3 miles away from the Garden Emporium site and cannot help but feel a sense anxiety. I have lived here for six years and have two children. Our house is accessed off a single narrow lane which already requires my children to be more aware of road safety when they go out to play. Increasing the risk of harm upon my children (and others in the settled area) by having a surge of increased traffic through the area will result in a constant endless worry for their safety. It will spoil the tranquillity of the village and possibly change its reputation whereby current residents may no longer wish to continue to live here. This would be a great shame since the rural ness is what attracted me in deciding to live here.

To conclude, I appreciate the decision already made to build the 12 houses at the Garden Emporium site and the advantages it could bring. However, my points above strongly argue the case for the problems that would emerge with 40 houses. In this instance, I request that the LDP abolish this proposal so to preserve the environment around the site. Instead, I would wish them to focus upon providing new affordable housing which has minimal disruption and maximum benefit to Fferm Goch.

Representor ID and details: 4251/DP1 Mr John Saal

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 previously-developed 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 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 P1 - 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

Representor ID and details: 4251/DP1 Mr John Saal

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 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

Representor ID and details: 4251/DP1 Mr John Saal

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 106 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 Lliardiard/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 Lliardiard 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 Rhose, 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

Representor ID and details: 4251/DP1 Mr John Saal

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 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 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.

Representor ID and details: 4251/DP1 Mr John Saal

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 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:

Representor ID and details: 4251/DP1 Mr John Saal

- 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 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 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).

Representor ID and details: 4251/DP1 Mr John Saal

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 Hamlets/Rural 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 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.

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,

Representor ID and details: 4251/DP1 Mr John Saal

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 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 -

No Status

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

Representor ID and details: 4251/DP2 Mr John Saal

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
MG9. MD12. MG2. .	6.49. 6.52. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	Yes	Unanswered
<u>Notes:</u>					

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 East of Llangan Site Reference: Site reference 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.

Please see following detailed comments below

I have serious reservations regarding the proposal of a Gypsy and Traveller Site being given planning permission in Llangan. These concerns stems from two main worries: firstly that the area does not accommodate the need of the G&T community due to the rural locality of the proposed site and secondly the effects that it will cause to those currently residing in Llangan

To address my first concern, as noted above, the village of Llangan has a population of less than 100 and the MG9 site would add increased pressure on local resources and infrastructure. The emergency services and the local primary school have confirmed themselves that they have not been consulted about the site and those that live or work in Llangan also echo this in their belief that insufficient discussion has taken place.

There are many examples in the proposal by the LDP that many national policies are being actively breached. Welsh Government Circular have previously defined the site as "unsustainable" and subsequently it scored zero points on the assessment scale. The LDP has a clear model/vision of social integration for all that live in the Vale of Glamorgan. This would be contradicted with the location of this G&T residence due to the distance it would be from the businesses and facilities available in Llangan.

It is crucial to the wellbeing of Gypsies or Travellers that they also have the right to live in areas that keep them safe and promote opportunities for social inclusion. Observations of the site have concluded that access to the MG9 site is "poor and unsafe" because there is no public footpath or street lighting. An independent Highway Study also confirmed the unsuitability of the 1KM site lane and that it would need upgrading which consequently would disrupt the environment. The secluded nature of the site will make those living there feel disconnected from the area. These feelings could be reciprocated by those already living in the area. In my opinion, this will create a 'social barrier' where tensions have the potential to arise from both parties.

From my understanding of the LDP, it struck me that its aims for the traveller site greatly conflict with the desires that are often represented by those in the G&T community (i.e. as discussed in the Fordham

Representor ID and details: 4251/DP2 Mr John Saal

report). As an illustrative example from this report, it was found that those living on the Shirenewton site were critical of its location from local amenities and a lack of access to public transport. They also commented that their preference was for their living sites to be situated on the outskirts of towns. In this respect this makes me more concerned that Llangan as a place will ultimately fail in responding to their needs since the village does not have accommodating resources.

My brother and his wife live 0.5 miles away from where the traveller site would be and I cannot help but feel a sense of personal disapproval. They have lived in Llangan for six years and have two children – both girls. Their house is accessed off a single narrow lane which already requires the children to be more aware of road safety when they go out to play. I am aware that some Gypsy cultures encourage 'grabbing' which would be extremely damaging to the reputation of Llangan if any innocents were targeted. Increasing the risk of harm upon my nieces (and others in the settled area) by adding this gypsy tradition as a factor to their safety will result in endless worry and unnecessary widespread panic. I believe that it could cause many residents to move and house prices will fall in value if the site were to be approved.

To conclude, I appreciate the surrounding legal and social mobility dilemmas that present themselves when creating legislation which provides accommodation for Gypsies and Travellers. My points have mainly focussed on the inability of the site being suitable and the empathy that I feel towards anyone having to live there. In this instance, I request that the LDP change their proposal so to find alternative living arrangements for this new group of people looking to reside.

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 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.

Representor ID and details: 4251/DP2 Mr John Saal

- 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
 - 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

Representor ID and details: 4251/DP2 Mr John Saal

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 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

Representor ID and details: 4251/DP2 Mr John Saal

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 from 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'".

"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"

Representor ID and details: 4251/DP2 Mr John Saal

"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 Llanqan 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

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 breaches 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.

Representor ID and details: 4251/DP2 Mr John Saal

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 -

No Status

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

Representor ID and details: 4252/DP1 Nikki Jones

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4252/DP1 Nikki Jones

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4253/DP1 Theresa Seldon

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	Unanswered

Notes:

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Site Name: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4253/DP1 Theresa Seldon

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4254/DP1 Stacey Gooding

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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):
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Notes:

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"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4254/DP1 Stacey Gooding

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4255/DP1 Mr Peter & Mrs Rachel Smith

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
31/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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	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: Site Reference:

3e - Please set out your representation below:
Vale of Glamorgan Local Development Plan 2011 — 2026 (LOP)

We refer to the above plan and wish to record our concern that the proposed additional housing will have an adverse effect on the flow of traffic through Dinas Powis unless there is considerable investment in the transport infrastructure before the housing development takes place.

We do not object to the proposals in the LDP for additional housing in the east Vale. We do note however that the local highways are already under serious pressure. Pen y Turnpike Rd., is congested every day during rush hours, and in between times is regularly subject to dangerous driving. Traffic coming from the Vale passes through Dinas Powis in an attempt to avoid the congestion on the Cardiff Rd., at Llandough and at the Merrie Harrier junction, causing an unwelcome level of congestion in the village, Mill Rd., and Pen y Turnpike Rd., to the point where there is standing traffic during peak periods.

We were surprised and disappointed to note that the LDP, as published, made no mention of the effects of the proposed housing on traffic flow, and there were no proposals to improve the infrastructure. Nor - as far as we are aware - are there any plans to improve the availability and use of public transport, although it is difficult to see how the provision of extra road transport could improve the situation even now, given the current level of traffic use.

We believe that no additional housing should be built until there has been a substantial improvement in road infrastructure, and arrangements made to prevent volumes of traffic using the village centre, Britway Rd., and Mill Rd., as short cuts to Pen y Turnpike Rd.

We are also concerned at the lack of any mention of community facilities for the proposed housing developments, notably sporting and health facilities.

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 -

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

Representor ID and details: 4256/DP1 Mr Colin & Mrs Mair Decker

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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?

New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
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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: Site Reference:

3e - Please set out your representation below:

I note in the Vale of Glamorgan Local Development Plan 2011 - 2026 that it is proposed to allow 150 houses to be built on a greenfield site in Wick.

Whilst it is sensible to plan for the future well-being and development of the Vale of Glamorgan, I fail to understand why it is proposed that Wick, which is designated a minor rural settlement within the plan, should be designated for an expansion of circa 70% 'at a stroke'.

This will be tantamount to creating a housing estate with the impact of town density on the edge of the village.

This appears to contradict paragraph 7.3.4 of the LDP

- '7.34 In order to enable new development that can help sustain rural communities, supporting existing services and providing new employment, settlement boundaries have not been defined around minor rural settlements. 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.'

Had the LDP included a proposal of 10% additional housing for Wick, this would have been tolerable.

My observations to the proposal for 150 houses to be included in the LDP development plan concerning Wick are as follows

Scale:

Wick would practically double in size and would impact adversely on its social and physical character. The site suggested for such a development would have a build density that cannot be considered to 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.

Infrastructure:

If a very cautious assumption that each householder has just one vehicle (and many have more than one vehicle), the proposal would result in an additional 150 vehicles using the current road system. Many of the minor roads that service the village of Wick are in a poor state of repair. Access to Bridgend via the Ewenny roundabout and via the bridge at the Ewenny quarry is difficult currently. The additional vehicles that the LDP plan proposes would tend to swamp the current road system.

Representor ID and details: 4256/DP1 Mr Colin & Mrs Mair Decker

There have been water supply and foul sewerage problems for the existing population; the proposal in the LDP would pose serious problems.

Amenities:

The current school is almost full and would be unable to cope with the additional demand that would inevitably result from LDP proposal.

The village shop has just reopened, providing a convenience store of half the size that was provided by the previous owners. The LDP proposal for Wick would result in much greater volume of road traffic to local towns in order to undertake householder shopping.

Commuter Traffic:

There is no employment in Wick. Therefore, the LDP proposal would result in a considerable increase in the volume of commuter traffic, causing damage to the environment, danger to villagers (existing and new) from the increase in traffic.

The existing rural bus service could not cope; for example there is no direct link to Cowbridge from Wick. Villagers wanting to use the bus service would have to travel via Llantwit Major or Bridgend to enable travel to Cowbridge, a journey that nobody would undertake due to the time involved. Thus another example of why road use would increase exponentially.

Environment:

The proposed site is greenfield and agricultural, providing wide views out of the village towards the Heritage Coast. I note that the brownfield site at Llandow has been excluded from the LDP. The pollution caused by additional road vehicles, argued above, would have a detrimental impact upon wild life. Additional vehicles using minor roads without pavements would create a dangerous environment to other users of the roads — pedestrians, cyclists, horse riders.

Employment:

There is no employment in the local area. Merely increasing the size of the village by circa 70% would not increase opportunities for local employment and would increase commuter traffic.

Summary

In summary, I cannot see how the LDP proposal for increasing the 'minor rural settlement' of Wick by circa 70% on a greenfield agricultural site meets the objectives stated in paragraph 7.34 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 -

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

Representor ID and details: 4257/DP1 Jean Tait

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4257/DP1 Jean Tait

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4258/DP1 Mr David & Mrs Barbara Hopkin

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(34).

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	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: Site Reference:

3e - Please set out your representation below:

I note in the Vale of Glamorgan Local Development Plan 2011 — 2026 that it is proposed to allow 150 houses to be built on a greenfield site in Wick.

Whilst it is sensible to plan for the future well-being and development of the Vale of Glamorgan, I fail to understand why it is proposed that Wick, which is designated a minor rural settlement within the plan, should be designated for an expansion of circa 70% 'at a stroke'.

This will be tantamount to creating a housing estate with the impact of town density on the edge of the village.

This appears to contradict paragraph 7.3.4 of the LDP

- '7.34 In order to enable new development that can help sustain rural communities, supporting existing services and (providing new employment, settlement boundaries have not been defined around minor rural settlements. 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.'

Had the LDP included a proposal of 10% additional housing for Wick, this would have been tolerable.

My observations to the proposal for 150 houses to be included in the LDP development plan concerning Wick are as follows

Scale:

Wick would practically double in size and would impact adversely on its social and physical character. The site suggested for such a development would have a build density that cannot be considered to 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.

Infrastructure:

If a very cautious assumption that each householder has just one vehicle (and many have more than one vehicle), the proposal would result in an additional 150 vehicles using the current road system. Many of the minor roads that service the village of Wick are in a poor state of repair. Access to Bridgend via the Ewenny roundabout and via the bridge at the Ewenny quarry is difficult currently. The additional vehicles that the LDP plan proposes would tend to swamp the current road system.

Representor ID and details: 4258/DP1 Mr David & Mrs Barbara Hopkin

There have been water supply and foul sewerage problems for the existing population; the proposal in the LDP would pose serious problems.

Amenities:

The current school is almost full and would be unable to cope with the additional demand that would inevitably result from LDP proposal.

The village shop has just reopened, providing a convenience store of half the size that was provided by the previous owners. The LDP proposal for Wick would result in much greater volume of road traffic to local towns in order to undertake householder shopping.

Commuter Traffic:

There is no employment in Wick. Therefore, the LDP proposal would result in a considerable increase in the volume of commuter traffic, causing damage to the environment, danger to villagers (existing and new) from the increase in traffic.

The existing rural bus service could not cope; for example there is no direct link to Cowbridge from Wick. Villagers wanting to use the bus service would have to travel via Llantwit Major or Bridgend to enable travel to Cowbridge, a journey that nobody would undertake due to the time involved. Thus another example of why road use would increase exponentially.

Environment:

The proposed site is greenfield and agricultural, providing wide views out of the village towards the Heritage Coast. I note that the brownfield site at Llandow has been excluded from the LDP. The pollution caused by additional road vehicles, argued above, would have a detrimental impact upon wild life. Additional vehicles using minor roads without pavements would create a dangerous environment to other users of the roads — pedestrians, cyclists, horse riders.

Employment:

There is no employment in the local area. Merely increasing the size of the village by circa 70% would not increase opportunities for local employment and would increase commuter traffic.

Summary

In summary, I cannot see how the LDP proposal for increasing the 'minor rural settlement' of Wick by circa 70% on a greenfield agricultural site meets the objectives stated in paragraph 7.34 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 -

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

Representor ID and details: 4259/DP1 Louise Brookes

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
M	<input type="checkbox"/>	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Unanswered C2 - Yes C3 - Yes C4 - Yes

Coherence and Effectiveness Tests - CE1 - Yes CE2 - Yes CE3 - Unanswered CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (ID 30); Residential allocations table (page 145); Housing Supply Background Paper (November 2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

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 previously-developed 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

Representor ID and details: 4259/DP1 Louise Brookes

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 P1 - 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

Representor ID and details: 4259/DP1 Louise Brookes

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 106 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 Lliidiard/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

Representor ID and details: 4259/DP1 Louise Brookes

- 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 Rhose, 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 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

Representor ID and details: 4259/DP1 Louise Brookes

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

Representor ID and details: 4259/DP1 Louise Brookes

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 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.

Representor ID and details: 4259/DP1 Louise Brookes

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 Hamlets/Rural 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 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.

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.

Representor ID and details: 4259/DP1 Louise Brookes

- 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 -

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

Representor ID and details: 4259/DP2 Louise Brookes

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents.

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	Yes	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: Land east of Llangan Site Reference: Site reference 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 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 councils 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 and the new sites should meet the needs of the gypsy traveller community. The new sites should also take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

Please see following detailed comments which are 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 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

Representor ID and details: 4259/DP2 Louise Brookes

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

- 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

Representor ID and details: 4259/DP2 Louise Brookes

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 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:

Representor ID and details: 4259/DP2 Louise Brookes

"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 from 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:

Representor ID and details: 4259/DP2 Louise Brookes

"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."

"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"

Representor ID and details: 4259/DP2 Louise Brookes

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 breaches 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 or sites that have 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 -

No Submission

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

Representor ID and details: 4260/DP1 Kingfisher Gallery

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4260/DP1 Kingfisher Gallery

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4261/DP1 Rachel A.Pugh

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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:
MD12. MG9. . .	0.0 - All. February 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Langan Site Reference: Site reference MG 9 / ID 22 Appendix 1

- 3e - Please set out your representation below:
- Emergency Services and local primary school have not been consulted on proposed site MG9.
 - 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.
 - Proposed site does not meet with national policy in respect of sustainability.
 - The allocation of MG9 is not consistent with the proposed LDP policies.
 - The Land Use Plan and Housing Strategy is outdated and does not provide any structure for assessing G & T needs or site location.
 - 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.
 - The allocation of the MG9 Site places heavy emphasis on the use of the car to access the above most basic facilities.
 - 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.
 - Business would be generated from the site in contradiction of the Rural Exceptance guidance.
 - 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.
 - The site is too small and does not meet the minimum requirements for emergency vehicles.
 - 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.

Representor ID and details: 4261/DP1 Rachel A.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 14units 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 -

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

Representor ID and details: 4262/DP1 Yanna Willey

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unanswered

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Notes:

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Site Name: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

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This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4262/DP1 Yanna Willey

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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No Status

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

Representor ID and details: 4263/DP1 Room for Living

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4263/DP1 Room for Living

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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(ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4264/DP1 Mrs P Tuckey

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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)

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Notes:

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4264/DP1 Mrs P Tuckey

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4265/DP1 Sue McDonagh

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

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This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4265/DP1 Sue McDonagh

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4266/DP1 Ms Jenny Crofts

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

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2b - If you think that the Plan is unsound and does not meet one or more test(s) of soundness, please indicate which test(s) that it fails.

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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(23).

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):
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Notes:

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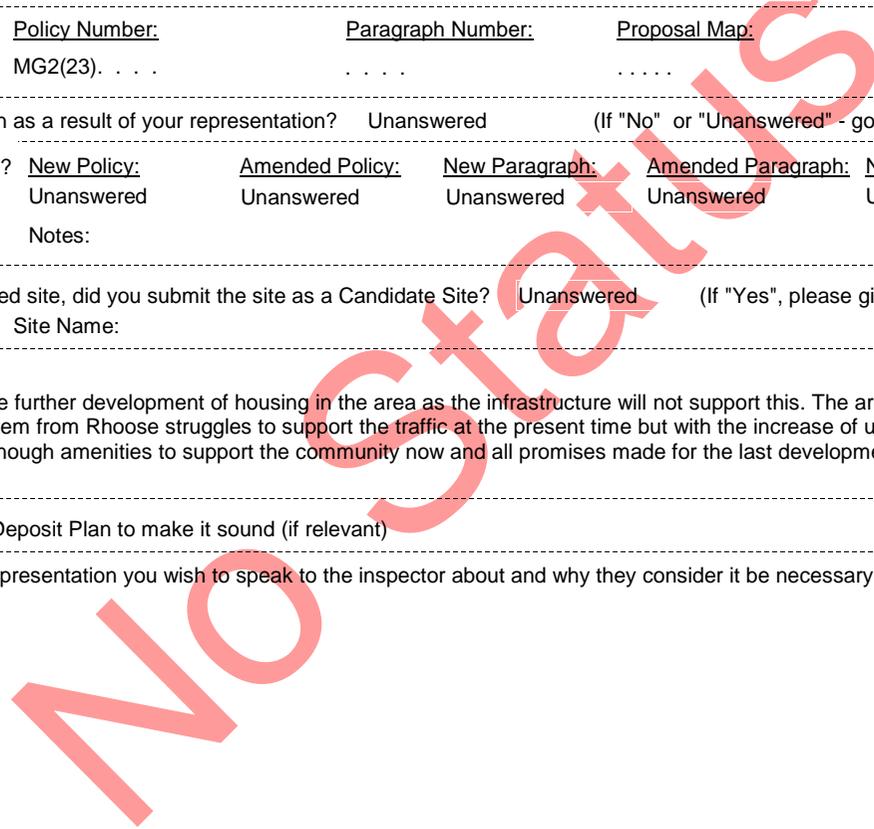
Site Name: Site Reference:

3e - Please set out your representation below:

As a resident of Rhoose Point I am against increasing the further development of housing in the area as the infrastructure will not support this. The area is developed enough and any future increase in housing will decrease the areas community values. The road system from Rhoose struggles to support the traffic at the present time but with the increase of up to 500 homes would surely come to a complete stop. There is no room at the school for more pupils and not enough amenities to support the community now and all promises made for the last development have not been delivered so I'm afraid future promises are worthless.

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 -



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

Representor ID and details: 4267/DP1 J Rees

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

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Representation ID No.)

Representor ID and details: 4267/DP1 J Rees

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No Status

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

Representor ID and details: 4268/DP1 T Aylward

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4268/DP1 T Aylward

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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No Status

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

Representor ID and details: 4269/DP1 Mr Daniel Tomos Hughes

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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:
MD12. MG9. . .	0.0 - All. February 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land east of Llangan Site Reference: MG 9 / ID 22 Appendix 1

3e - Please set out your representation below:
Procedural Tests

P1 – Limited consultation and engagement regarding the LDP has been undertaken by the Vale of Glamorgan Council. The proposed site has not been submitted to the community in line with the Community Involvement Scheme in that the emergency services and school were not consulted, and registered consultees have not been informed of the consultation stages. The Welsh Government puts a responsibility on all Local Authorities to consult with its strategic partners in delivering Gypsy and Traveller sites – this has not taken place.

P2 – The proposed site in Llangan is without doubt not sustainable and is not consistent with the proposed LDP policies. The proposal to establish a site in Bonvilston (September 2011) was rejected by the Vale of Glamorgan Council and this decision clearly demonstrates inconsistencies in their consideration of the sustainability of a site.

Consistency Tests

C1 – The plan does not relate to any strategy.

C2 - The Llangan site does not comply with National Policy:
As this is a rural site with no local shop, regular transport or health facilities, Llangan and Fferm Goch score 0 points in the evidence based assessment Sustainable Settlements Appraisal, and does not take into account the scale of the resident community (Welsh Government Circular (30/2007)).

The site is not large enough and does not meet the needs identified in the LDP (Designing Gypsy and Traveller Sites Good Practice Guide). The proposal is not sustainable and does not meet the standards that would be expected for social housing.

(Travelling to a Better Future) - the Vale of Glamorgan has not engaged with their Housing Association Partners – joint transit and residential sites are not preferred by the Gypsy and Traveller community.

(Planning Policy Wales) – the site is unsustainable.

C3 – the proposed site fails soundness test Consistency C3 as the policy does not have due regard to the Wales Spatial Plan. As this is a rural site with no local services and in addition poor access to these services, it does not fulfil the objectives of the Wales Spatial Plan.

Representor ID and details: 4269/DP1 Mr Daniel Tomos Hughes

C4 – the site has no regard for the relevant community strategy in that there is no employment or provision for health and shopping. As previously mentioned the availability of regular public transport is also poor.

Coherence and Effectiveness Tests

CE1 - The plan does not set out a coherent strategy from which its policies and allocations logically flow. This is a rural site and does not meet the following objective within the strategy.

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

“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 facilities and transport links at this location are not met.

The allocation of MG9 does not comply with the following objectives – 1, 2, 3, 4, 5, 7, 10.

CE2 – there is a lack of consideration of the recommendations of the Fordham Report, which was commissioned by the Vale of Glamorgan Council:

12.10 - the Gypsy and Traveller community emphasised the importance of public transport to any new sites; (7.38 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) and stated that they wanted smaller sites located on the fringes of larger communities. (9.34 – 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).

The road that runs through the village of Llangan to Treoes is used by commuters travelling from the Vale of Glamorgan to the north side of Bridgend which makes these single track rural lanes busy at times when children would potentially be walking on an unlit road with no pavement.

I would also question some of the statements made in the Gypsy and Traveller site assessment;

The SSA states 0 points for public transport but the Gypsy and Traveller site assessment states that this is good.

The Gypsy and Traveller site assessment states that there is “good highway access”, however the access falls short of the minimum requirement for vehicle access at 2.5m against a minimum 3.7m plus footpath of 1.2m

The Gypsy and Traveller site assessment does not reflect the current legal obligations of the Council, yet the other site assessments highlight legal issues.

The assessment makes no reference:

that the site is in a Special Landscape Area

that the site is adjacent to a Conservation Area, within the Conservation Management plan for this area there is specific requirement to protect the view from the edge of the conservation area over the proposed site.

The assessment suggests that Fferm Goch is the local settlement – Llangan is recognised as the local settlement being only 150m from the proposed site.

I would also question the following:

how the appraisal scored 9 points. Three of these points are for employment on the basis of the 4 light industrial buildings. The employers at these buildings have confirmed that no new jobs have become available in the last 9 years – the units employ less than 15 people with no plans for expansion. I would also like to add that this is not a popular industrial site and that one of the units is and has been empty.

Fferm Goch (which has a population of 98) is classified as a Minor Rural Settlement (probably based on the 9 points). Of the 5 sites with a population of 98, only Fferm Goch is classified as a Minor Rural site, the remainder are classified as Hamlets. The guidance requires all sites of a population below 100 to be classified as a Hamlet.

All of the above demonstrates inconsistency with the allocation of MG9 against the proposed policies and does not meet the identified needs of Gypsies and Travellers.

CE3 – The Vale of Glamorgan Council have not outlined how it is they propose to manage such a large site bearing in mind that the site in Rover Way Cardiff has 3 full time staff. No reference is made as to how the Travelling Community will be monitored in relation to growth or need, and there is no strategy that underpins the Gypsy and Traveller community or housing.

Representor ID and details: 4269/DP1 Mr Daniel Tomos Hughes

CE4 – Policy MD12 is not reasonably flexible to enable it to deal with changing circumstances. It does not allow the Vale of Glamorgan to bring forward sites that are sustainable or suitable for the Gypsy and Travellers through the policies derived within the plan, and I would recommend that it 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)

That the MG9 site is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place. Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community and that 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 -

No Status

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

Representor ID and details: 4270/DP1 Adam Jones

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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)

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New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
Unanswered	Yes	Unanswered	Unanswered	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
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Representor ID and details: 4270/DP1 Adam Jones

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4271/DP1 Sarah Hughes

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
M	<input type="checkbox"/>	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

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3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (ID 30); Residential allocations table (page 145); Housing Supply Background paper (November 2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

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 previously-developed 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

Representor ID and details: 4271/DP1 Sarah Hughes

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 P1 - 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

Representor ID and details: 4271/DP1 Sarah Hughes

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 106 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 Lliidiard/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

Representor ID and details: 4271/DP1 Sarah Hughes

- 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 Rhose, 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 35% 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 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

Representor ID and details: 4271/DP1 Sarah Hughes

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

Representor ID and details: 4271/DP1 Sarah Hughes

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 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.

Representor ID and details: 4271/DP1 Sarah Hughes

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 Hamlets/Rural 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 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.

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.

Representor ID and details: 4271/DP1 Sarah Hughes

- 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 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)

Representor ID and details: 4271/DP1 Sarah Hughes

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.

No Status

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

Representor ID and details: 4271/DP2 Sarah Hughes

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
M	<input type="checkbox"/>	0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes		
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes		

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
MD12. MG9. . .	0.0 - All. February 2012	Appendix 9 - Supporting Documents. . . .

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	Yes	Unanswered
<u>Notes:</u>					

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)

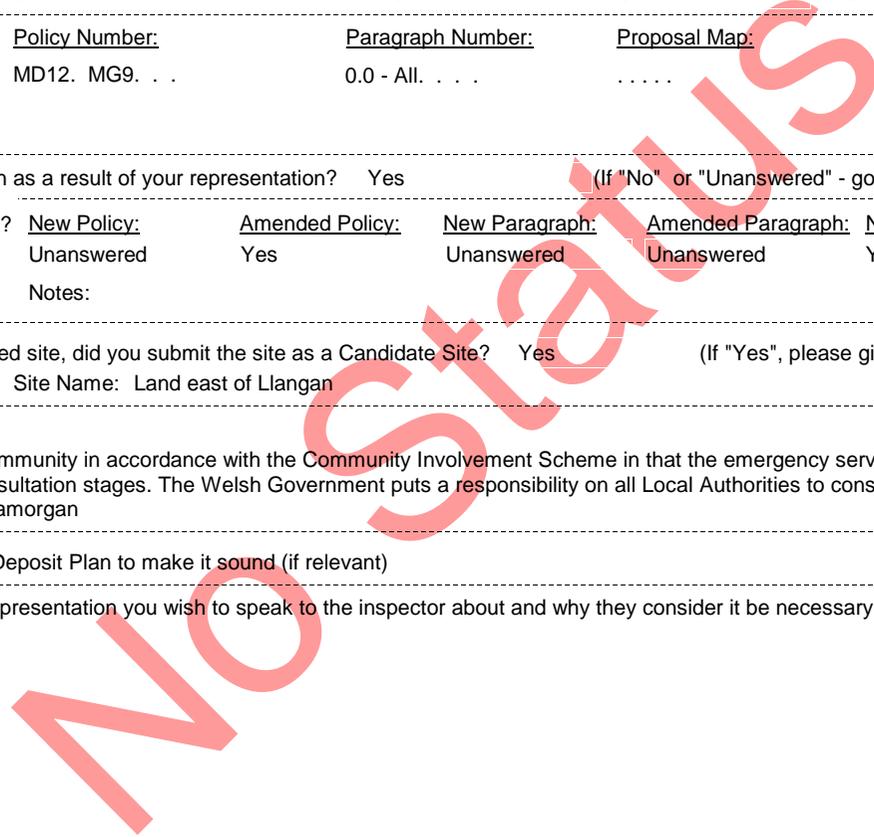
Site Name: Land east of Llangan Site Reference: MG 9 / ID 22 Appendix 1

3e - Please set out your representation below:

P1 - The proposed site has not been submitted to the community in accordance with the Community Involvement Scheme in that the emergency services and school were not been consulted, and that registered consultees have not been informed of the consultation stages. The Welsh Government puts a responsibility on all Local Authorities to consult with its strategic partners in delivering Gypsy and Traveller sites – this has not taken place. The Vale of Glamorgan

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 -



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

Representor ID and details: 4272/DP1 Liz Herbert

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4272/DP1 Liz Herbert

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
M	<input type="checkbox"/>	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Unanswered	C2 - Yes	C3 - Yes	C4 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (ID 30); Residential allocations table (page 145); Housing Supply Background Paper (November 2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

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 previously-developed 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

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

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 P1 - 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

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

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 106 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 Lliidiard/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

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

- 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 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

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

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

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

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 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.

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

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 Hamlets/Rural 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 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.

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.

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

- 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)

Representor ID and details: 4273/DP1 Mr Thomas Geraint Hughes

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.

No Status

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

Representor ID and details: 4273/DP2 Mr Thomas Geraint Hughes

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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:
MD12. MG9. . .	0.0 - All. February 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land east of Llangan Site Reference: MG 9 / ID 22 Appendix 1

3e - Please set out your representation below:
Procedural Tests

P1 – Limited consultation and engagement regarding the LDP has been undertaken by the Vale of Glamorgan Council. The proposed site has not been submitted to the community in line with the Community Involvement Scheme in that the emergency services and school were not consulted, and registered consultees have not been informed of the consultation stages. The Welsh Government puts a responsibility on all Local Authorities to consult with its strategic partners in delivering Gypsy and Traveller sites – this has not taken place.

P2 – The proposed site in Llangan is without doubt not sustainable and is not consistent with the proposed LDP policies. The proposal to establish a site in Bonvilston (September 2011) was rejected by the Vale of Glamorgan Council and this decision clearly demonstrates inconsistencies in their consideration of the sustainability of a site.

Consistency Tests

C1 – The plan does not relate to any strategy.

C2 - The Llangan site does not comply with National Policy:
As this is a rural site with no local shop, regular transport or health facilities, Llangan and Fferm Goch score 0 points in the evidence based assessment Sustainable Settlements Appraisal, and does not take into account the scale of the resident community (Welsh Government Circular (30/2007)).

The site is not large enough and does not meet the needs identified in the LDP (Designing Gypsy and Traveller Sites Good Practice Guide). The proposal is not sustainable and does not meet the standards that would be expected for social housing.

(Travelling to a Better Future) - the Vale of Glamorgan has not engaged with their Housing Association Partners – joint transit and residential sites are not preferred by the Gypsy and Traveller community.

(Planning Policy Wales) – the site is unsustainable.

C3 – the proposed site fails soundness test Consistency C3 as the policy does not have due regard to the Wales Spatial Plan. As this is a rural site with no local services and in addition poor access to these services, it does not fulfil the objectives of the Wales Spatial Plan.

Representor ID and details: 4273/DP2 Mr Thomas Geraint Hughes

C4 – the site has no regard for the relevant community strategy in that there is no employment or provision for health and shopping. As previously mentioned the availability of regular public transport is also poor.

Coherence and Effectiveness Tests

CE1 - The plan does not set out a coherent strategy from which its policies and allocations logically flow. This is a rural site and does not meet the following objective within the strategy.

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

“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 facilities and transport links at this location are not met.

The allocation of MG9 does not comply with the following objectives – 1, 2, 3, 4, 5, 7, 10.

CE2 – there is a lack of consideration of the recommendations of the Fordham Report, which was commissioned by the Vale of Glamorgan Council:

12.10 - the Gypsy and Traveller community emphasised the importance of public transport to any new sites; (7.38 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) and stated that they wanted smaller sites located on the fringes of larger communities. (9.34 – 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).

The road that runs through the village of Llangan to Treoes is used by commuters travelling from the Vale of Glamorgan to the north side of Bridgend which makes these single track rural lanes busy at times when children would potentially be walking on an unlit road with no pavement.

I would also question some of the statements made in the Gypsy and Traveller site assessment;

The SSA states 0 points for public transport but the Gypsy and Traveller site assessment states that this is good.

The Gypsy and Traveller site assessment states that there is “good highway access”, however the access falls short of the minimum requirement for vehicle access at 2.5m against a minimum 3.7m plus footpath of 1.2m

The Gypsy and Traveller site assessment does not reflect the current legal obligations of the Council, yet the other site assessments highlight legal issues.

The assessment makes no reference:

that the site is in a Special Landscape Area

that the site is adjacent to a Conservation Area, within the Conservation Management plan for this area there is specific requirement to protect the view from the edge of the conservation area over the proposed site.

The assessment suggests that Fferm Goch is the local settlement – Llangan is recognised as the local settlement being only 150m from the proposed site.

I would also question the following:

how the appraisal scored 9 points. Three of these points are for employment on the basis of the 4 light industrial buildings. The employers at these buildings have confirmed that no new jobs have become available in the last 9 years – the units employ less than 15 people with no plans for expansion. I would also like to add that this is not a popular industrial site and that one of the units is and has been empty.

Fferm Goch (which has a population of 98) is classified as a Minor Rural Settlement (probably based on the 9 points). Of the 5 sites with a population of 98, only Fferm Goch is classified as a Minor Rural site, the remainder are classified as Hamlets. The guidance requires all sites of a population below 100 to be classified as a Hamlet.

All of the above demonstrates inconsistency with the allocation of MG9 against the proposed policies and does not meet the identified needs of Gypsies and Travellers.

CE3 – The Vale of Glamorgan Council have not outlined how it is they propose to manage such a large site bearing in mind that the site in Rover Way Cardiff has 3 full time staff. No reference is made as to how the Travelling Community will be monitored in relation to growth or need, and there is no strategy that underpins the Gypsy and Traveller community or housing.

Representor ID and details: 4273/DP2 Mr Thomas Geraint Hughes

CE4 – Policy MD12 is not reasonably flexible to enable it to deal with changing circumstances. It does not allow the Vale of Glamorgan to bring forward sites that are sustainable or suitable for the Gypsy and Travellers through the policies derived within the plan, and I would recommend that it 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)

That the MG9 site is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place. Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community and that 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 -

No Status

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

Representor ID and details: 4274/DP1 Sarah Keep

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252./CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4274/DP1 Sarah Keep

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4275/DP1 Mr & Mrs Coleman

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(27).

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	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: Site Reference:

3e - Please set out your representation below:
 We are writing to register our objections to the proposed housing development in Aberthin (MG2 (27), land adjacent to Court Close) as outlined in the recently published LDP.

- Our primary objections would be:
1. Much of the proposed access road - Welsh St. Donats Lane (Whitefields Farm Lane) - is only wide enough for one vehicle, with passing for two cars already difficult. I do not believe this lane is wide enough to safely accommodate the additional traffic that would be generated by this proposed development.
 2. The danger presented by an increase in the number of cars pulling "out" of Welsh St. Donats Lane onto the A4222 (alongside the Hare and Hounds Public House). This is a "blind" pullout onto the A4222 (looking towards Ystradowen) and given the speed of vehicles approaching from Ystradowen (already deemed too dangerous by the Highways inspector for a pedestrian crossing) is particularly dangerous. Any increase in traffic pulling out from Welsh St. Donats Lane onto the A4222 from this blind junction will further increase the likelihood of a traffic accident at this spot.
 3. The danger presented by stationary traffic on the A4222 attempting to turn "into" Welsh St. Donats Lane (alongside the hare and Hounds public house). At its entrance onto the A4222 Welsh St. Donats Lane is only wide enough for one vehicle. This means if a car is waiting to pull out from Welsh St. Donats Lane, the Lane effectively becomes blocked; cars cannot pull into the lane, creating stationary traffic on the A4222. Cars approaching from Cowbridge along the A4222 turn around the sharp 90 degree blind bend (alongside the Farmers Arms Pub) to be met by stationary traffic. Given the speed of cars approaching from Cowbridge, this has already led to a number of near misses, and any increase in the traffic entering and leaving Welsh St. Donats Lane will further compound this problem and will result in a serious accident. The sharp blind bend (alongside the Farmers Arms) is too dangerous to have stationary traffic immediately after this bend.
 4. During heavy rain, the volume of water flowing down Welsh St. Donats Lane is quite astonishing, and frequently leads to the bottom of the lane being completely flooded. Currently the fields at the top of Welsh St. Donats Lane act as a soak-away - should these fields be built upon, we are likely to see an increase in the risk of flooding for all properties alongside and especially at the bottom of Welsh St. Donats Lane.
 5. Conservation Area concerns - the proposed site is alongside The Great House in Aberthin, a Grade II listed building, and any new development would detract from this important listed building, and the Aberthin Conservation area in general.
 6. General Infrastructure - we also have concerns about the capacity for the infrastructure to cope with any additional housing development; specifically water pressure (Whitefields farm already suffers low water pressure), sewerage, lack of a consistent bus service, and the local schools already being full to capacity - it is our belief that significant further investment in local infrastructure, especially Schools, would be required prior to any additional housing development in this area.

Representor ID and details: 4275/DP1 Mr & Mrs Coleman

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 -

No Status

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

Representor ID and details: 4276/DP1 Ms Elaine O'Connor

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Llangan Site Reference: Site reference 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).

Representor ID and details: 4276/DP1 Ms Elaine O'Connor

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;

Representor ID and details: 4276/DP1 Ms Elaine O'Connor

- 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 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 from 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 reclassified 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,”

Representor ID and details: 4276/DP1 Ms Elaine O'Connor

"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 breaches 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 -

No Submission

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

Representor ID and details: 4277/DP1 Mr Ian O'Connor

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes		
Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Llangan Site Reference: Site reference 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.

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2. The allocation of MG9 is not consistent with the proposed LDP policies.

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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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-Welsh Government Circular (30/2007):

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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.”
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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 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 from 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 reclassified 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,”

Representor ID and details: 4277/DP1 Mr Ian O'Connor

"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.

Representor ID and details: 4277/DP1 Mr Ian O'Connor

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 breaches 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 -

No Submission

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

Representor ID and details: 4278/DP1 Mr Kevin Fuller

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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	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:	Site Reference:

3e - Please set out your representation below:
 Re: LDP Development Proposals – response to consultation

I wish to make representations regarding your LDP proposals and in particular to the Development site at St. Nicholas village. I attempted to complete your on line form but did not have any success. I spent over three hours of my time completing the form (reference number 46068E) when I attempted to save the document I had the message "cannot save the form at this time" on a blank white screen. I found this very frustrating as I had lost the information I entered onto part 3 of the form and this could not be retrieved. I am therefore putting my response into this letter to you. I would be grateful if you could send me an acknowledgment that this has been received by email as I don't have any confidence in your systems.

I don't believe the proposed development site of 50+ new houses in St. Nicholas meets the objectives and strategy within the Vale's Local Development Plan written statement document. I understand part of the land for development is a previous candidate site but the largest part is not and was added by the Vale of Glamorgan Council. I understand that no site assessment exists for this site added by the Vale of Glamorgan. The main objective within the LDP is to promote new developments within the South East Zone and St. Nicholas is not within this area so cannot see why the Council would add such a large site for over 50no. properties which is not in its specified area for development.

A recent meeting was held in the community of St. Nicholas attended by over 80no. residents (a large proportion of the village) and all vigorously objected to the proposals of development on the site proposed. The local Community Council which represents the residents of St. Nicholas oppose the development and also our Local Councillor (Councillor Bird). I have set out below my reasons for the proposed site not meeting the Vale of Glamorgan's own objectives and strategy within the LDP:-

Vale objective 1 – The settlement hierarchy for this site is not maintained and enhanced by ensuring the new development is of a 'scale' appropriate to its location. I believe the proposal to build 50+ new properties on the site proposed is over development of the area bordering the conservation area within St. Nicholas village. St. Nicholas has approximately 165no. properties and adding 50+new properties would immediately increase the number of properties in the village settlement by 30%. This is too vast for this small village and a major development would adversely affect existing local residents. This would not support the local economy as there are no major employers in the village. The only employers are a small supporting people business and the local primary school where the majority of employees are skilled and employed from outside the village area. The development would not improve local services and facilities as there is currently very little in the way of such facilities; we have no shop, restaurant, health centre, doctors, nursery or pub etc.

Vale objective 2 – The proposed new development is not in a sustainable location and will not minimise the need for travel. Most people who live in rural communities such as St. Nicholas own cars as these are crucial in order to travel to and from the village. The nearest shops and services are approximately 2 miles away and travelling by bus carrying shopping etc. is not an option for most people in the village who have to walk some distances from the bus stop to their homes. Most households now own at least two vehicles which would mean an extra 100+ extra vehicles travelling and servicing the village highway network. For people living in affordable housing the public transport services, i.e. bus service is very expensive and does not operate frequently enough. The proposed site is on open countryside and has been identified as grade 2 agricultural land which is considered the best and most versatile. This would be a great loss of prime land which should be maintained as agricultural. The development for residential use

Representor ID and details: 4278/DP1 Mr Kevin Fuller

does not reflect the density of the surrounding area of St. Nicholas.

Vale objective 3 – The proposed new development would not meet this objective to increase sustainable transport and reduce congestion and is certainly not that well served by public transport. In reality what you would see is a vast increase in personal transport using the existing creaking highway network. Congestion is already a problem during peak times with vehicles already backing up from Culverhouse Cross through the village on the A48 during peak times and busy periods. This new development would exacerbate the situation and there is only a single public road within the core of the village where two vehicles are not able to pass each other simultaneously. This would make access via Ger Y Llan in the village impossible thus requiring a new road network to be built from the development directly onto the A48. Such a network would require the need for new traffic light systems which would be very close to the existing ones on the A48 thus creating bottle neck situations and more traffic congestion in the village. The 30mph speed limit zone within the village would also have to be extended far beyond the current village boundary to accommodate a new highway network from the development. In addition the National Trust has recently taken over the management of Dyffryn House and their mission is to increase visitor numbers which I understand will be up to 250,000 per annum. The main access to and from Dyffryn House & gardens is through St. Nicholas which would create extra vehicles and congestion in and around the village. In addition it is proposed to build a further 200+ properties on sites at Culverhouse Cross which would also affect the traffic congestion problems through the village especially at peak times and this development would the situation much worse.

Vale objective 4 – The proposed development will not meet this objective in enhancing the Vale of Glamorgan's historic, built and natural environment. This dense development is bordering the conservation area of the historic village of St. Nicholas and will result in an erosion of the natural habitats of the wildlife and detract from the attractiveness of the village. The natural environment of this prime agricultural land would be lost for ever if such a development to build properties was allowed.

Vale objective 5 – The village of St. Nicholas has not many community facilities and will certainly not reduce the need for people to travel and will have a negative effect on the existing residents of the village. The village has no shops, pubs or restaurants and no doctors or health centre, and people will take to their personal transport to travel to such facilities. Most people would use their vehicles to make many short journeys which is against the policy of the Council to reduce the need for short journeys. The extra traffic will add to congestion and increase noise and exhaust pollution around the village. The new development will put extra pressure on the existing facilities, namely the primary school in the village which is already over subscribed for the number of pupils wishing to attend. Many families are already left disappointed because of the lack of available spaces and the school needs investment for more space and modernisation to meet existing needs without any extra pressures this new development would create. It would not currently meet the needs of families within this new proposed development. The quality of life of existing residents would seriously be affected by this new development, with improvements required in all the major services causing disruption and increased levels of traffic and noise etc.

Vale objective 7 – The housing will not support the needs of the local community and will not enhance the role and functions of the village. There will be an increased burden on the local school and infrastructure and it will not create employment opportunities in the village as there is a lack of facilities to support such a development. The proposed development would see the erosion of the character of the conservation area in St. Nicholas and is a step closer to rural urbanisation which existing residents do not want to see. It would seriously affect the quiet enjoyment of rural life for those that already live in the village. The proposed development does not meet the Council's LDP strategy statements. There is no need for such a development especially one which has to have 35% affordable housing. There is no net demand for affordable houses in St. Nicholas and East Vale as recorded by the Vale of Glamorgan's Council in its Local Housing market assessment dated November 2010. The development will therefore not meet the need for growth as there is currently no such demand in this location. The strategy also favours the use of previously developed land and promotes sites in sustainable locations with good access to employment, public transport, community facilities and shops. The village of St. Nicholas has none of these facilities and could not support the needs for 100+ extra residents. The development would not meet the Vale's strategy in protecting and enhancing the areas unique and built assets. The site is within the Ely Valley and Ridge slopes special landscaped area so such a development would see the erosion of this natural environment. The Vale of Glamorgan's strategy acknowledges the need for moderate growth in minor rural settlements to help meet the need for local housing demand and support existing services. As previously explained there is no local demand for housing on this large scale and a 30% increase in the amount of properties in the village is certainly not moderate growth.

The development would not maintain and improve access for all as the village has very few facilities and an infrequent and expensive bus service. Suitable access to the site could not be met through Ger Y Llan because there is only a single track road through the core of the village and two vehicles are unable to simultaneously pass each other at the same time. The existing roads through the village are not suitable to service such development and there is no ability to improve this situation. The roads do not have pavements and people walking on the highway are already subject to health and safety risks and this new development with extra people and vehicles would exacerbate the situation. This is already evident at peak times in the village when parents collect their children from the local primary school. There is arguably no deprivation in the village but should this be the case there is no employment opportunities in the village and no health centres etc, to reduce this.

In summary I am against allowing such a development for the following additional reasons:-

- The field is part of our special landscaped area currently used for grazing and is prime agricultural greenfield land. This should be cherished and protected and certainly not built upon. The Council is usually very strict on developments in minor rural settlements and especially one which is adjacent to a conservation area but are now seriously considering proposing a big development in a special landscaped area?
- This land has a public footpath through it which residents and families use.
- The proposed development is outside the existing settlement boundary of St. Nicholas so will effectively be built in open countryside. This LDP wants to amend the current St. Nicholas boundary and is using the loophole which allows affordable housing to be built outside settlement boundaries. As previously explained there is no need or demand for affordable housing at this location.
- More houses means more traffic – the local roads around the village will not be able to cope especially with other proposals being considered, e.g. Culverhouse Cross and increased visitor numbers to Dyffryn House and Gardens.
- There are no local facilities, no pubs, shops, restaurants, doctors, health centre, nursery etc. and the local primary school is already oversubscribed. All such facilities will require residents to take short car journeys which are contrary to Council policy. The absences of such services are particularly relevant to residents in affordable homes.

Representor ID and details: 4278/DP1 Mr Kevin Fuller

- The A48 will require major works in order to serve the development which again will affect local residents and others using the A48.
- Development on this site will affect the wildlife that lives in the field and surrounding areas and will also remove prime agricultural land for use by farm animals.
- There will be a major environmental impact on the village and its residents.
- The proposed development by reason of its size, height and massing would have an unacceptably adverse impact on the amenities of the properties immediately adjacent to the site and surrounding area by reason of overlooking, loss of privacy and visually overbearing impact
- If the development had inadequate parking facilities this would potentially lead to new residents parking their cars in the village causing safety problems on the existing single track roads around the village. This would be unsympathetic to the appearance and character of the local environment.
- The development by reason of its siting would lead to a fragmented form of development which would be out of keeping with and detrimental to the character and appearance of the area. It would also be harmful to the open, rural and undeveloped character of the green belt.
- Development on this scale would overwhelm the village and is contrary with Council Policy (MG 7) for residential development within minor rural settlements.
- The Vale of Glamorgan's Highway Engineers have already advised that access to and from Ger Y Llan is not appropriate to accommodate additional residential development.
- In creating a new access on the A48 there will be problems and dangers to and from a new junction necessitating the requirement for other traffic measures such as additional light systems etc. This will affect traffic flow, particularly at peak periods.
- New houses should be built on brownfield sites and not greenfield especially this one which is in open countryside and part of the Rural Vale Green Belt
- Many properties in Barry and urban areas are vacant and needing repair. In the Council's draft empty homes strategy 2012 739no. Homes are identified as long term vacant (1.3% of the Vales entire housing stock) of this 53no. vacant homes were identified in Cowbridge, 21no. vacant homes in Peterstone Super Ely, 82no. vacant homes in Sully and 249no. vacant homes in Barry. In accordance with the Vales own draft strategy which states it is estimated that it would take the equivalent of 12no. football pitches of land to build 800no. homes. This could be greenfield sites of open land that local people value. It would be much more efficient and sustainable to make best use of the homes we already have and divert resources to bringing these back into use instead of using greenfield sites.
- Renovation of older homes in more urban areas would avoid the cost of providing expensive infrastructure on a new development such as roads and necessitate the need for provision of facilities which could not be provided or immediately available.
- The site is unsuitable for affordable housing because of the absence of facilities and limited costly public transport.
- St. Nicolas is an area of architectural and historic interest which would seriously be devalued by this new development.
- Encroachment into the open countryside that protects the rural character of the Vale would erode the Green Belt separating the Vale from Cardiff.
- The Government is encouraging local communities to take more control on local matters and proposals which directly affect them through its new Localism Act. The Government wants local communities to have more of a say in what happens in their areas so I hope that the Council will take note of such a large proportion of the village turning out to discuss and oppose this scheme.

I hope that development of this site will not take place especially the proposal for 50no. plus new homes. I hope that common sense will prevail and my valid objections are taken into consideration I would like the site removed from the Vale of Glamorgan's 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 -

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

Representor ID and details: 4279/DP1 Mr Derek Evans

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/02/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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?

New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
Unanswered	Unanswered	Unanswered	Unanswered	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:	Site Reference:

3e - Please set out your representation below:

I am one of the committee members of the Rhoose Point residents association which represents over 1000 residents residing at Rhoose Point.

There are a number of issues I have in relation to the LDP and its proposals for the future of this area, which include:

- * Providing additional infrastructure to cope with the already high demand placed on the facilities and services available to Rhoose residents, which include all forms of transport; school placement and availability; shops; doctor/dentists; etc
- * Having existing areas currently available on the existing Rhoose Point site developed accordingly
- * Obtaining a comprehensive development application for any future new developments, including obtaining monetary guarantees that allow the VoG council the opportunity to finalise areas should the developers suddenly 'encounter problems' as per Cofton.
- * Consultation with residents to identify potential issues of concern prior to any development, planned or otherwise
- * The current population of Rhoose is greater than that of Cowbridge. The services the residents there have available greatly outweigh what we have available here. Rhoose is a village, not a town, so please leave it that way. If you cannot, then provide the infrastructure that is comparable to Cowbridge.

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 -

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

Representor ID and details: 4280/DP1 David Living

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4280/DP1 David Living

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4281/DP1 Andrew Morgan

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.
LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4281/DP1 Andrew Morgan

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4282/DP1 S P Marriott

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Examination

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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):
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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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, 2252/CS.4

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Representor ID and details: 4282/DP1 S P Marriott

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

We are a recent new business who has interest in the trading environment of Cowbridge. We are reliant on visitors travelling from as far as Bristol and Cardiff and Bridgend and a high level of tourists coming to shop in Cowbridge and dine at our acclaimed restaurant.

I want to speak about the shocking and potential devastating impact the loss of the cattle market can and would have on the trading and business prospects on such an established and evolved trading town.

No Statistics

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

Representor ID and details: 4283/DP1 Tim Marriott

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Examination

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2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	Unanswered

Notes:

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Site Name: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4283/DP1 Tim Marriott

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4284/DP1 Cllr Rob Curtis

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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 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	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: Site Reference:

3e - Please set out your representation below:

I wish to register my opposition to the amount of housing planned in the LDP for the Port Road link(A4050) to the M4 and Cardiff. I am concerned that these plans may strangle the economic life out of Barry by gridlocking Barry's only major road link to Cardiff and the M4.

The current plan includes:

- Land to the North of Waycock cross, North Barry 500
- Land to the South West of Waycock Cross, North Barry 210
- White Farm, North Barry 130
- Land at East Pencoedtre, North Barry 67
- Land to the West of Pencoedtre, North Barry 30
- Land Port Road, Wenvoe 150
- Culverhouse Cross, Port Road 220

This road represents the primary connection for the town of Barry to the M4 and Cardiff, and as such our future economic prosperity and the resultant jobs depends on a clear and reliable connection.

This amount of housing will only add to the transport gridlock currently taking place at key times of the working day thus acting as a deterrent for new businesses to locate in or around Barry.

I also fear the future economic development and growth of Cardiff Airport could be put at risk by the future addition of yet further roundabouts and traffic lights along this vital road link.

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 -

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

Representor ID and details: 4285/DP1 Mrs C Hawkworth

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
MD12. MG9. . .	0.0 - All. Feb 2012	Appendix 9 - Supporting Documents. . . .

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	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: Land East of Llangan Site Reference: MG 9 / ID 22

3e - Please set out your representation below:

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

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 MD12 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 -

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

Representor ID and details: 4286/DP1 Julian Hitchcocks

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4286/DP1 Julian Hitchcocks

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4287/DP1 Mr & Mrs D Marchant

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(19).

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):
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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: Site Reference:

3e - Please set out your representation below:
 Objection to the proposed Land Use Allocation of St. Cyres (Dinas Powys) for Residential Use

The following objection to the proposed allocation of St. Cyres for residential use is based on the following concerns:

1. Transport Infrastructure and Air Quality
2. Site Access
3. Loss of Playing fields and community facilities
4. Impact and loss of countryside
5. Public Consultation

1. Transport Infrastructure

There are obvious concerns surrounding the existing capacity of transport infrastructure within and surrounding Dinas Powys road and rail networks, and further strain of an extra 420 homes being developed on this site. This will equate to approximately 400 - 800 extra cars, equating to at least 800 – 1600 car journeys a day. The current state of the main arterial route, Cardiff Road, running through the village is already at and over its carry capacity at peak times. Routes to Cardiff and Barry currently suffer from extensive congestion at peak times during the morning and afternoon rush hours. This has clear impacts upon key areas of consideration such as air quality, road traffic safety and the economic viability of the existing and proposed commercial properties within Barry and Cardiff. Air quality readings have identified pollutants being in excess of acceptable levels on Cardiff Road, and taking into account the increased motor car usage of this highway, this air quality issue will clearly be exacerbated by the development of 420 homes. There are no specific mitigation measures stated within the proposal allocation or any other mitigation measures targeted at resolving this issue within the wider LOP. This is consider contradictive to European Legislation laid down in Air Quality Directive (2008/50/EC) and will jeopardise the Council's obligations to reduce NOx (main pollutant of car engine emissions) emission levels as set out in the National Emission Ceilings Directive (2001/81/EC), which was subsequently made into UK law as the National Emission Ceilings Regulations 2002.

The public transport infrastructure network serving Dinas Powys is also approaching critical capacity levels. The train service from both stations (Dinas Powys and Eastbrook) is often over capacity at peak morning and afternoon rush hour times. Again, there appears to be no mitigation measures put forward within the LDP or proposal statements to alleviate this issue. There does not appear to be any local strategic transport assessment (bringing forward the recommendations of the Regional Transport Plan to a district level) in the background I evidence base documents supporting the LDP.

There also seems to be serious concerns regarding the previously proposed traffic mitigation measure (Dinas Powys bypass) as put forward in the Unitary Development Plan (UDP). There appears to be no substantial evidence of why this is no longer necessary. This traffic scheme was previously proposed to tackle existing levels of congestion passing through Dinas Powys. There appears to be no proposed

Representor ID and details: 4287/DP1 Mr & Mrs D Marchant

bypass within the Local Development Plan even though forecast levels of housing growth are substantially higher than those considered during the production of the UDP. If the proposed development goes ahead this will result in the loss of the Dinas Powys bypass ever happening.

2. Site Access

The Local Development Plans Wales published by the Welsh Assembly Government in 2005, states "The identification of sites for specific uses (including mixed uses) should be founded on a robust and credible assessment of the suitability and availability of land for particular uses or a mix of uses and the probability that it will be developed.", The site assessment of the proposed site set out in the LDP appears to be insufficient. The level of detail set out in the quantitative analysis detailed in Findings of the Candidate Site Assessment Process (2011) appears to be very vague and insufficient to make an assessment upon. This quantitative analysis is not backed up with any specific qualitative analysis of the proposed sites. A number of sites, including the St. Cyres site state the need for a number of assessments, including transport, landscape, archaeological etc, but these have not even been screened or scoped at the allocations stage, thus putting at risk the future delivery of the site at a later stage. There appears to be a lack of risk management to ensure the development is acceptable in principle, the site is suitable and increasing the probability that it will be developed. The assessment of the site access appears to be very 'light touch' and this approach is considered insufficient. There is clearly a need to ensure the site access to a proposed residential allocation is either presently acceptable or if it is not, that future mitigation measures (to be put forward and assessed at the application stage) are available to ensure it's delivery. This has not been carried out and thus has not demonstrated the allocation is robust and sound.

This is thus considered to fail CE3 and CE4 of the tests of soundness.

The level of detail within the proposal statement of this site, and others, is extremely poor. The guidance also states "Policies relating to the delivery of the site specific allocations, such as critical access requirements, phasing, broad design principles or substantive planning obligations which may be sought, should, where possible, be set out in the plan" (Para 2.17). This again demonstrates how the proposed site is failing to comply with guidance set out to ensure the local authority produces a sound and robust development plan.

The site allocation proposal statements are of such insufficient detail and lack of clear information relating to key areas of delivery including "access requirements, phasing, broad design principles or substantive planning obligations". Proposal statements should be of sufficient and specific detail to the site to allow and ensure the future delivery of the allocation. The level of information of the proposal statement does not allow this and puts at risk future delivery. Taking this into account, the LDP and specifically the proposal statements are not considered compliant with the Welsh Assembly Governments Guidance - The Local Development Plans Wales (2005). This is considered to fail CE3 and CE4 of the tests of soundness.

NB: The general lack of detail relating to mitigation measure to alleviate identified (in this objection and by the Council through their own evidence base work), brings into question the viability of the proposed sites within the LDP. A key issue of delivery will be the economic viability of proposed when taking into account mitigation measures identified to overcome site specific and in-combination impacts of the development upon the existing built and natural environment. This lack of detail relating to mitigation thus makes the assessment of viability impossible and again brings into question the delivery of proposed allocations, and thus the soundness of the LDP. This is considered to fail CE3 of the tests of soundness.

3. Loss of Playing Fields

The loss of playing fields does not seem to have been addressed within the Site Assessment or the proposal statements set out in the LDP. There appears to be no open space or playing field assessment within the background I evidence based documents supporting the loss of playing fields of the St. Cyres site. This assessment would assess current existing levels of playing pitch provision and put forward a broad quantum of need in line with future development levels within the district, and would then be drilled down to a settlement based level. This does not appear to have been carried out and there appears to be no off site contribution towards playing field provision within Dinas Powys. This again links back to the issue of mitigation and the lack of detail within the proposal statements, and the potential impact upon the viability of the site and its future delivery. This is considered to fail CE3 and CE4 of the tests of soundness.

4. Impact and Loss of Countryside

The proposal statement for the St. Cyres site states there is clearly a need for a landscape character assessment to address potential impacts of a development. However, there is clearly a need to address this issue, even at a screening and scoping stage, to ensure any potential impacts are addressed at the forward planning stage to make sure the site is capable of being developed at all. The lack of landscape character assessment screening and scoping is another key concern of a lack of comprehensive site assessment process during the formulation of the LDP. This is considered to fail CE3 and CE4 of the tests of soundness.

5. Public Consultation Process

It is considered the public consultation undertaken as part of the pre-deposit draft was insufficient to gather public opinion on the preferred strategy before the production of the deposit draft. There appears to be a lack of active engagement with residents of the Vale of Glamorgan, with only one workshop organised during this consultation period. The Welsh Assembly Government state:

"An open process of public consultation is envisaged, with clear information on the process and opportunities for the community and interested parties to make representations. Publicity for proposals and mechanisms in the CIS should be sufficient to encourage all sectors of the community to be involved. All participants in the preparation process should ensure that they have made their views known and

Representor ID and details: 4287/DP1 Mr & Mrs D Marchant

identified proposed sites early in the process." Local Development Plans Wales (2005)

This has clearly not been carried out and thus 'public buy in' was not sought before the production of the deposit draft.

There is also no evidence of the initial consultation document to report back how any comments received at the pre-deposit stage were taken into account and any potential amendments to the LDP have been made, as stated under LDP Regulation 16.

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 -

No Status

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

Representor ID and details: 4288/DP1 Mr Raymond D Johnson

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

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Procedural Tests - P1 - Unanswered P2 - Unanswered

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Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4288/DP1 Mr Raymond D Johnson

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4289/DP1 Mr Kevin & Mrs Elizabeth Davis

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

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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)

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New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
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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: Site Reference:

3e - Please set out your representation below:
Submission to the vale of Glamorgan LDP Deposit Plan 2011-2026

We are writing to express our concern to the above plan. We are residents of Dinas Powys and are particularly anxious about the effects of the proposed additional housing and the impact it will have on transport and life within the village.

Currently the A4055 is congested at peak times, with the junction at the Merry Harrier being at full capacity. The proposed housing (400 on the St Cyres annex and Caerleon Road) would access the A4055 at the two available junctions thereby adding a possible additional 600 cars each day. This means that the minor roads leading to the 2 junctions will be busier and the potential risks to drivers and pedestrians increased. These problems are separate to what could arise from the other proposed new housing sites nearby.

E.g. Building on the land adjacent to St Joseph's school will certainly impact the Merry Harrier junction further. The 2000 units already approved at the Waterfront, Barry will increase traffic again through Dinas Powys on A4055.

Consideration therefore needs to be given towards building suitable link roads between Barry and Cardiff and/or Dinas Powys to cope with the extra volume of traffic. Public transport is available but needs to be greatly improved to encourage increased users at peak times. At present the trains are already overflowing and increased buses will only get caught up in the already congested roads. Transport issues need to be looked into and solutions found before increasing housing in this area.

The increased volume of traffic will also mean longer queues with the resulting increase in air pollution. With the infant school being on the corner of a major junction is this fair on our young children?

With the changes in schools within the Vale and the Penarth St Cyres site eventually catering for pupils from Maes Dyfan, Barry, (in addition to Ysgol Erw'r Delyn and Ashgrove), again further children will be bussed through Dinas Powys which will impact traffic on the A4055.

At present Dinas Powys remains a large village with a community feel but the proposed changes could make this more difficult in the future. Dinas Powys is in need of increased sports facilities, medical service centre and a local church is looking to have a permanent base. Consideration needs to be given to other uses of the St. Cyres land that would be of benefit rather than detriment to the immediate community.

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

Representor ID and details: 4290/DP1 Sam Smith Travel

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

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Representor ID and details: 4290/DP1 Sam Smith Travel

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No Status

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

Representor ID and details: 4291/DP1 Samantha Edwards

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4291/DP1 Samantha Edwards

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4292/DP1 Tim Lloyd

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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):
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Notes:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4292/DP1 Tim Lloyd

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4293/DP1 Jon Marshall

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

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Procedural Tests - P1 - Unanswered P2 - Unanswered

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Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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Notes:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4293/DP1 Jon Marshall

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

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No Status

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

Representor ID and details: 4294/DP1 Lynne Beresford

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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2b - If you think that the Plan is unsound and does not meet one or more test(s) of soundness, please indicate which test(s) that it fails.

Procedural Tests - P1 - Unanswered P2 - Unanswered

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Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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Notes:

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Representation ID No.)

Representor ID and details: 4294/DP1 Lynne Beresford

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

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No Status

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

Representor ID and details: 4295/DP1 Jeyes Gift Shop

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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3a - Which part of the Deposit Plan are you commenting on?

Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
60. 113. . .	7.56. MG2(11)

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Notes:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4295/DP1 Jeyes Gift Shop

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No Status

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

Representor ID and details: 4296/DP1 John Curle

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

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3a - Which part of the Deposit Plan are you commenting on?

Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4296/DP1 John Curle

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

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No Status

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

Representor ID and details: 4297/DP1 Mr Richard Barnes

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does not meet one or more test(s) of soundness, please indicate which test(s) that it fails.

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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: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes):

Unanswered Unanswered Unanswered Unanswered 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: Site Reference:

3e - Please set out your representation below:

I would like to formally contest the need for a further 650 houses in the Rhoose LDP plan on the following basis

1/ the current Development is still to be completed at Rhoose Point and seriously lacks the services and facilities needed to support the community. The school is struggling to provide places to families, there is no social facilities developed on site and there is no sports or leisure facilities despite Rhoose being larger than Cowbridge.

2/ The roads are "one in and one out" of Rhoose and would be difficult to adapt to such a growth of cars with those houses. The impacts would be compounded given the developments proposed at Waycock Cross, new new Crematorium and the housing developments on Port Rd. The current rush hour traffic makes commuting very difficult and time consuming without adding the volumes proposed with these developments.

3/ Rhoose Point lacks any retail or social developments within the current community and no further developments should be considered until this present development has been completed. Just because there is a parcel of land north of the railway line, which is bigger than current Rhoose Point, it does not mean it should be built upon without any serious review or consultation with Rhoose residents. This area provides the existing developments with the open and green environment feeling and appearance that is why people chose Rhoose as a place to live. We should be preserving our quality of life and countryside not seeking to build at every opportunity. Brownfield sites should be the priority for development of the area not "green fields" and that does not appear to be in the LDP plans to the extent that it should.

Regards, Richard Barnes

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 -

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

Representor ID and details: 4298/DP1 W G Davis

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. MG15. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4298/DP1 W G Davis

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4299/DP1 Ms Kate Watts

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
01/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(27).

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	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: Site Reference:

3e - Please set out your representation below:
LDP Plan - Court Close Site (MG2(27))

Having lived in Aberthin for 15 years I wish to object to the proposed site at Court Close. My primary reasons for objection are

1. Increased traffic for the dangerous junction at the A4222 - our children are already struggling to cross the road safely to walk to the Comprehensive school.
2. Damaging the setting of the beautiful listed building, The Great House.
3. Unacceptable intrusion into the countryside - using a greenfield site.
4. 20 new houses is too large a percentage in a village of approx. 150 houses.
5. Local schools are already struggling with class sizes.

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 -

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

Representor ID and details: 4300/DP1 Bryan Bird

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. MG15. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

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This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4300/DP1 Bryan Bird

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4301/DP1 Susan Cecil

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	4a - do you want your comments to be considered 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 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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)

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4301/DP1 Susan Cecil

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4302/DP1 Sue Marshall

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

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The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4302/DP1 Sue Marshall

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4303/DP1 Cllr John Thomas

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Email	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(2), MG2(3).				

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	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: Site Reference:

3e - Please set out your representation below:

I believe that the LDP is unsound in respect of the scale of increase in housing in St Athan village.

The village is presently small with limited facilities and the building of over 500 new houses is unsustainable.

The need for these houses seems to be for the proposed Aerospace business Park which to my mind is purely speculative, it has been talked about by WDA WAG and WG for many years with very little new business encouraged to the area. In fact the employment situation in ST Athan is far worse than it has been for many years with the demise of the DARA Super hanger and now the VC10 servicing.

To say that St Athan is well served by transport is far from the truth. Residents in the village rely on a poor bus service and although there is a railway line running close to the village there is no halt. If this allocation is agreed I think there is a need to protect a site for a railway halt at St Athan within the LDP.

Land quality is another issue, all these allocations are on Greenfield agricultural land and the quality of the land, on the Church Farm site in particular, is excellent.

Therefore I would suggest that the scale of development in and around the village should be reduced greatly for the good of the village.

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 -

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

Representor ID and details: 4304/DP1 Carolyn Reeves

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4304/DP1 Carolyn Reeves

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4305/DP1 Mr James Davis

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Unanswered	C2 - Yes	C3 - Yes	C4 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (ID 30); Residential allocations table (page 1450; Housing Supply Background Paper (November 2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

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 previously-developed 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

Representor ID and details: 4305/DP1 Mr James Davis

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 P1 - 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

Representor ID and details: 4305/DP1 Mr James Davis

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 106 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 Lliidiard/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

Representor ID and details: 4305/DP1 Mr James Davis

- 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 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

Representor ID and details: 4305/DP1 Mr James Davis

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

Representor ID and details: 4305/DP1 Mr James Davis

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 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.

Representor ID and details: 4305/DP1 Mr James Davis

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 Hamlets/Rural 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 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.

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.

Representor ID and details: 4305/DP1 Mr James Davis

- 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 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 -

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

Representor ID and details: 4305/DP2 Mr James Davis

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2020	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness 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. 7.41. 7.44.	MG9. Feb 2012

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	Yes	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: Land East of Llangan Site Reference: Site reference MG9 / ID 22 Appendix 1

3e - Please set out your representation below:

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.

In my view the Council are guilty of lazy thinking. The predominant reason for siting the development in this location is that there is an existing single illegal resident there who has provoked no local opposition. The planners have thought this a good basis for being able to create a large gypsy camp there. It is not. It is also not a sound legal footing for their application.

Additional attached 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

Representor ID and details: 4305/DP2 Mr James Davis

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

- 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

Representor ID and details: 4305/DP2 Mr James Davis

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 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:

Representor ID and details: 4305/DP2 Mr James Davis

"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 from 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:

Representor ID and details: 4305/DP2 Mr James Davis

"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."

"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"

Representor ID and details: 4305/DP2 Mr James Davis

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 breaches 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 -

No Submission

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

Representor ID and details: 4306/DP1 Jane Davis

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswered

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
49. . . .	5.11. MG2 (ID 30); Residential allocations table (page 145); Housing Supply Background Paper (November 2011)	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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Yes	Yes	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: The Garden Emporium, Fferm Goch Site Reference: ID30 in the draft LDP

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 previously-developed 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

Representor ID and details: 4306/DP1 Jane Davis

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 P1 - 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

Representor ID and details: 4306/DP1 Jane Davis

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 106 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 Lliidiard/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

Representor ID and details: 4306/DP1 Jane Davis

- 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 Rhose, 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 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

Representor ID and details: 4306/DP1 Jane Davis

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

Representor ID and details: 4306/DP1 Jane Davis

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 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.

Representor ID and details: 4306/DP1 Jane Davis

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 Hamlets/Rural 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 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.

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.

Representor ID and details: 4306/DP1 Jane Davis

- 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 -

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

Representor ID and details: 4306/DP2 Jane Davis

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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. 7.41. 7.44. MG9 Feb 2012	Appendix 9 - Supporting Documents. . . .

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	Yes	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: Land East of Llangan Site Reference: Site Reference 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 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.

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 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).

Representor ID and details: 4306/DP2 Jane Davis

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;

Representor ID and details: 4306/DP2 Jane Davis

- 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 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:

Representor ID and details: 4306/DP2 Jane Davis

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 from 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,”

Representor ID and details: 4306/DP2 Jane Davis

"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.

Representor ID and details: 4306/DP2 Jane Davis

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 breaches 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 -

No Submission

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

Representor ID and details: 4307/DP1 E91 Classic

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) -- 2252./CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4307/DP1 E91 Classic

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4308/DP1 Mr P. & Mrs M.Harries

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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	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: Site Reference:

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns regarding 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. 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.

To add to that there are already 2000 houses approved at 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 drive through Dinas Powys, using both the main road and 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 is Dinas Powys expected to take?

As it is, residents within the older part of the Village are already 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 Pen-y-Turnpike. Theses roads are subjected to streams 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, particularly standing traffic, would exacerbate the potential polluting emissions from vehicles.

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.

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.

We live opposite St Peter's Church, Dinas Powys.

A young girl was killed a few years ago right outside our block of four houses, hence the narrowing of the road. It is an absolute nightmare between 7 and 9.30 in the morning and 4 to 6.30 in the afternoon. The driving is completely crazy. It is just horrible. Please have the common sense to stop the building of any more houses in the area.

Representor ID and details: 4308/DP1 Mr P. & Mrs M.Harries

The situation is completely OUT OF CONTROL.

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 -

No Status

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

Representor ID and details: 4309/DP1 Ms Amanda Harris

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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):
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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: Site Reference:

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 [PM10/5] 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.

Representor ID and details: 4309/DP1 Ms Amanda Harris

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No Status

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

Representor ID and details: 4310/DP1 Robin Wilkinson

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
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Notes:

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Site Name: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

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1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4310/DP1 Robin Wilkinson

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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Changes I wish to see made to the Deposit Plan to make it sound

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No Status

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

Representor ID and details: 4311/DP1 Sophie Breeze

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

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Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Yes CE4 - Yes

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The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4311/DP1 Sophie Breeze

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

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Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4312/DP1 Sarah Emerson- Thomas

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Unanswered

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2b - If you think that the Plan is unsound and does not meet one or more test(s) of soundness, please indicate which test(s) that it fails.

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Consistency Tests - C1 - Yes C2 - Unanswered C3 - Unanswered C4 - Yes

Coherence and Effectiveness Tests - CE1 - Unanswered 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:
60. 113. . .	7.56. MG2(11)

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	Yes	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: (a) - Cowbridge Cattle Market, (b) - Cattle Market, Cowbridge Site Reference: (a) - 178/CS.1, (b) - 2252/CS.4

3e - Please set out your representation below:

The Cowbridge Cattle Market performs an essential function in the town, for farmers as their preferred site for trading livestock (ref 1) and for visitors and shoppers as an informal car park with 200 space capacity (Ref 2).

This parking represents 45% of the 4456 long stay council owned parking spaces and 30% of the 651 total council and retail privately owned long stay spaces in and around the town centre. (There are also 122 existing roadside 1 hour limit spaces with an additional 138 Waitrose 2 hour limit spaces planned for late 2012).

The Deposit LDP Policy MG 2 (11) allocates this 0.87 ha site for residential development with the loss of its livestock market and public car parking functions.

This Policy proposes a "consolidated public parking scheme along the Grade II Listed town Walls". The area allocated for this extra parking in the Council development brief could accommodate about 25-30 spaces, involving a net loss to the town of 170-175 spaces (26-27% of the total long stay capacity). Cowbridge town has a population of 3616 (2001) census) and with Llanblethian 4100. This size of population is not sufficient to support and maintain the 150 shops and businesses in the town (Cowbridge Chamber of Trade estimate).

The town's prosperity and vitality depends on visitors and shoppers who come mainly by car. 33% come from the 16 surrounding villages for whom Cowbridge is an important hub of employment, shopping, business and social activities and who are poorly served by public transport and other local facilities. 46% of visitors come from the wider Vale of Glamorgan, Cardiff and Bridgend (ref 3). Intending shoppers by car in Cowbridge will follow the prevailing behaviour and go to Bridgend or Culverhouse Cross if they cannot find parking.

The proposed reduction of Cowbridge parking capacity in Policy MG 2 (11) goes contrary to the following LDP Policy Statements:

The Vale of Glamorgan Local Development Plan Retail Study undertaken for the Council by CACI states:

1.12 The Cowbridge study area currently has very little means of retaining its resident convenience spend of £33.3m. This expenditure is leaking to Bridgend and other zones, and is the highest expenditure leakage of any study zone.

The Challenges and Opportunities Section 3.20 of the Deposit LDP states:

"The leakage of expenditure in the retail sector to Cardiff and Bridgend" as a factor to be managed.

LDP Section 4 Vision and Objectives paragraph 4.3 states:

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4312/DP1 Sarah Emerson- Thomas

"Safeguard and enhance the vitality and viability of existing retail and tourist and visitor attractions that encourage people to use, visit and enjoy the diverse range of facilities and attractions on offer in the Vale of Glamorgan".

I therefore oppose the allocation of Cowbridge Cattle Market site for residential development as stated in Deposit LDP Policy MG 2 (11) because of the large impact it would have on the town's prosperity and vitality and because it is contrary to other parts of the LDP Policies as quoted above.

(ref) 1 Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011) by DRS Harris.

(ref) 2 Consultation Information on Parking in Cowbridge (2005, rev 2012) by C. A. Pearce and D. R. Williams, Cowbridge and Llanblethian Residents Group.

(ref) 3 Cowbridge Town Hall Car Park User Survey (Oct 2005) by C. A. Pearce and D. R. Williams.

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

Changes I wish to see made to the Deposit Plan to make it sound

Delete Policy MG 2 (11)

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 -

No Status

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

Representor ID and details: 4313/DP1 Mr & Mrs R.Brennan

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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	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: Site Reference:

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 [PM10/5] 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.

Representor ID and details: 4313/DP1 Mr & Mrs R.Brennan

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 -

No Status

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

Representor ID and details: 4314/DP1 Mrs Yvonne Pritchard

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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	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: Site Reference:

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 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 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 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 [PMIO5] 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

Representor ID and details: 4314/DP1 Mrs Vyonne Pritchard

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.

I agree with everything in this letter (above) and couldn't possibly write a better letter than this.

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 -

No Status

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

Representor ID and details: 4315/DP1 Captain K.Pearson

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Letter	

2a - Do you consider the LDP is Sound? Unanswered

2b - If you think that the Plan is unsound and does 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(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	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: Site Reference:

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 [PM10/5] 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.

Representor ID and details: 4315/DP1 Captain K.Pearson

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 -

No Status

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

Representor ID and details: 4316/DP1 L Grimes

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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 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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill golf course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4317/DP1 Alan Redpath

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I support the Deposit LDP approved by the Council on 25/1/2012. It's great to see it protects Brynhill all of golf course site. Please look after our recreational land and greenbelt sites.

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 -

No

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

Representor ID and details: 4318/DP1 Carol Redpath

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. Wherever possible all houses should not be built outside the residential settlement boundaries. Keep our land green.

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 -

No Status

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

Representor ID and details: 4319/DP1 N O'Connell

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

Good decision on the LDP Draft, to allow planning at Brynhill Golf Club would be such a mistake ecologically, plus it's such a pretty piece of green land when there is such a lot of brown land that would benefit from new builds.

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 -

NO

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by Representation ID No.)

Representor ID and details: 4320/DP1 Roger Muir

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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 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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I believe that any changes to LDP would be detrimental to all of the Vale inhabitants. Port Road itself regularly becomes grid locked even minor accidents/incidents like the petrol queuing last week stopped all traffic both ways. Traffic is a major threat to all the public on this road and is a real threat to ambulance and fire supports, more housing means even more vehicles and more disruption, the residents of Port Road and vicinity are sick of it, a clinical look must be given to all issues effecting the area.

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 -

NO STATEDS

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

Representor ID and details: 4321/DP1 Dorothy Humphrey

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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)

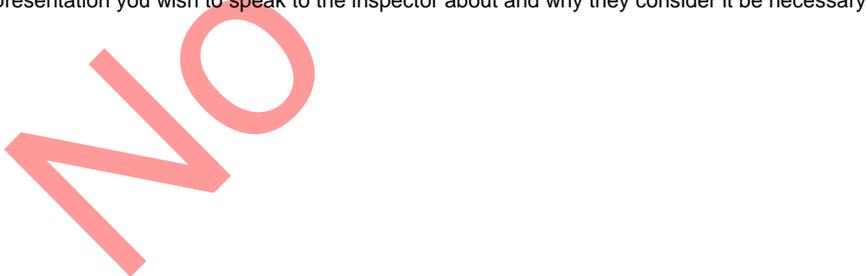
Site Name: Brynhill Golf Club Site Reference: 2407/CS1

3e - Please set out your representation below:

I would like to show my support for the Deposit LDP approved by the Council on 25th Jan 2012. The fact that the Deposit LDP protects Brynhill golf course land from being built on by housing developers is particularly encouraging. I believe it is very important that houses should not be built outside the residential settlement boundaries and that recreational and greenbelt should be protected wherever possible. I would appreciate it if you would acknowledge receipt of my letter.

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 -



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

Representor ID and details: 4322/DP1 S.Lamb

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAFF

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

Representor ID and details: 4323/DP1 G.Lamb

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4324/DP1 Lisa Edwards

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Course Site Reference: 2407/CS1

3e - Please set out your representation below:

I feel that building properties on the land known as Brynhill Golf Course would be detrimental to the ecological nature of this beautiful area, it would be disruptive to the many animals that live in this green area. I have a one year old daughter and I want her to grow up in a Barry with green space. It would be a tragedy for a green beautiful space to be turned into yet another concrete area.

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 -

NO

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by Representation ID No.)

Representor ID and details: 4325/DP1 Ms Adrienne French

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4326/DP1 Paul Whitefield

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	Unanswered

Notes:

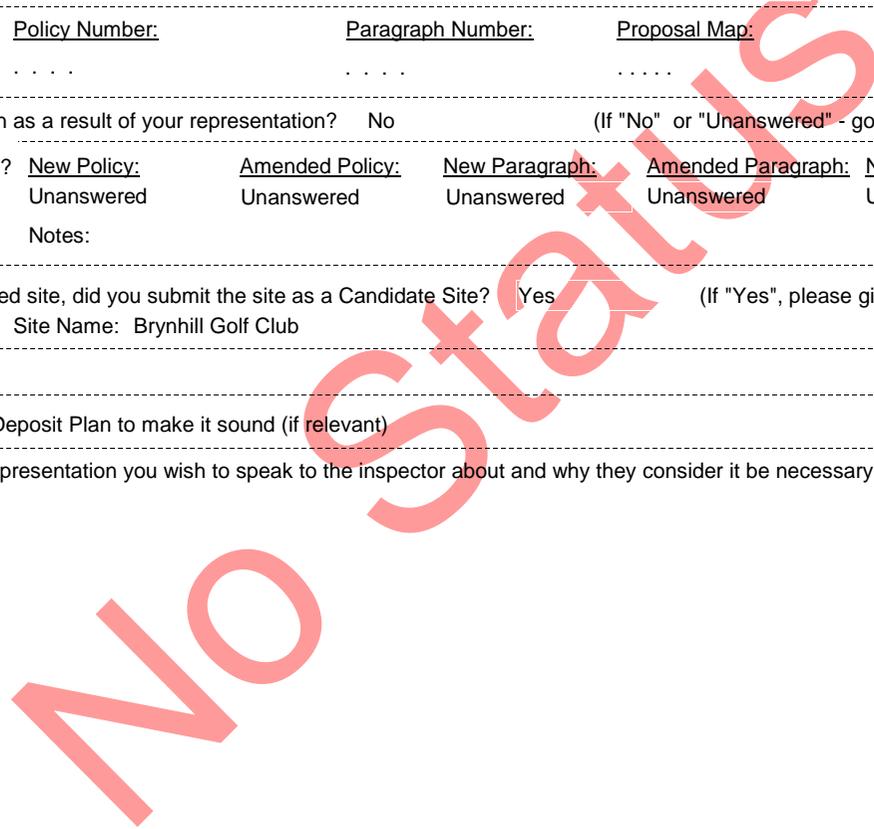
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Brynhill Golf Club Site Reference: 2407/CS1

3e - Please set out your representation below:

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 -



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

Representor ID and details: 4327/DP1 Mr Ken Bowler

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4328/DP1 Naz Theobalds

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
74. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAFF

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

Representor ID and details: 4329/DP1 Ann John

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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)

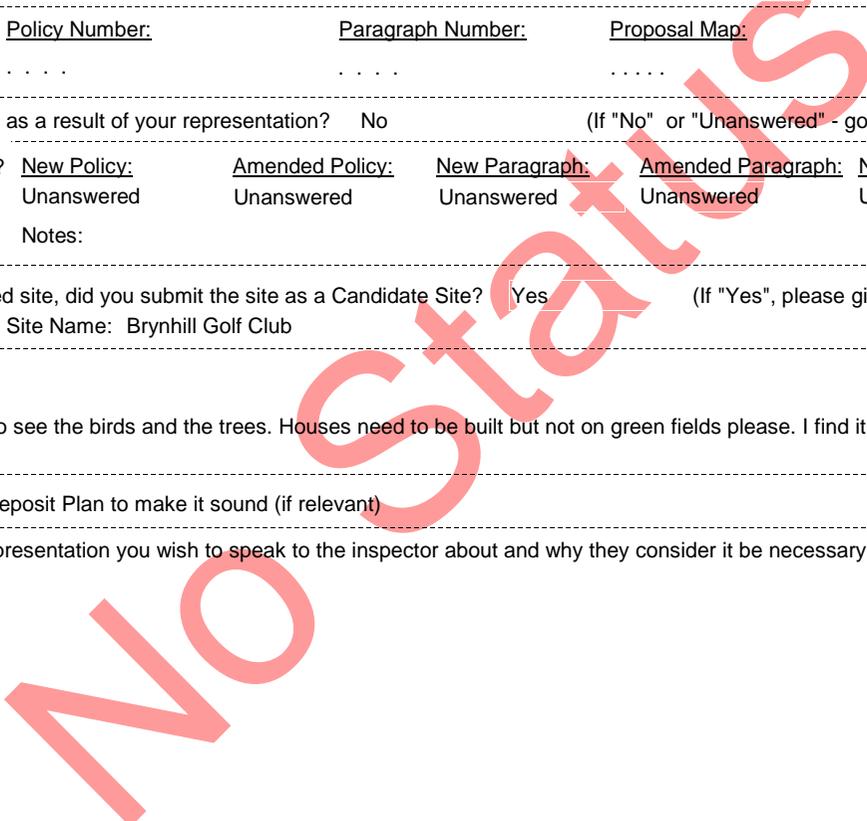
Site Name: Brynhill Golf Club Site Reference: 2407/CS1

3e - Please set out your representation below:

Well done Barry Council planning team!
 We don't need to lose any more green spaces. We love to see the birds and the trees. Houses need to be built but not on green fields please. I find it hard to cross my road now so we can't cope with any more traffic on the roads up the top end of our town.

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 -



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

Representor ID and details: 4330/DP1 Mrs Jean Nugent

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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 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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill golf course land from being built on by housing developers is particularly encouraging. I believe it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.mn

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 -

NO

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

Representor ID and details: 4331/DP1 Mr Peter Hardwick

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
74. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4332/DP1 Sandra J Morgan

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4333/DP1 Angharad R John

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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 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)

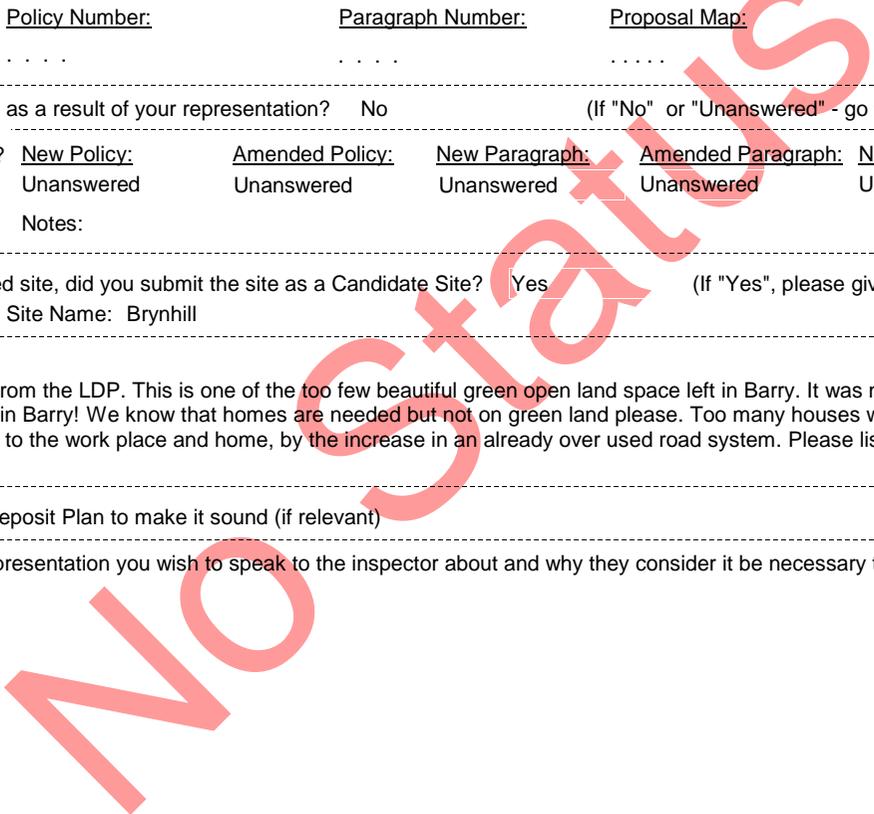
Site Name: Brynhill Site Reference: 2407/CS1

3e - Please set out your representation below:

I am delighted that the Council planning omitted this site from the LDP. This is one of the too few beautiful green open land space left in Barry. It was not in the UDP so the planning team definitely made the right decision well done! We want to keep our green land in Barry! We know that homes are needed but not on green land please. Too many houses will have an impact on the lives of residents of Barry causing noise and air pollution, stress by adding time on travelling to the work place and home, by the increase in an already over used road system. Please listen to us we live here. Don't let developers over turn the right decision has been made.

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 -



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

Representor ID and details: 4334/DP1 Hilary Harris

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4335/DP1 Mark John, 6 Hellas Drive

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I totally agree with the planning depts. LDP draft, we would be creating such a lot more congestion and pollution if land at Brynhill Golf Club was built on. As well as this it is such a lovely piece of green space for nature and recreations. Good decision, thank you.

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 -

NO

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

Representor ID and details: 4336/DP1 Marion Jellings

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4337/DP1 Mr Ryan Cox

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25th January 2012. The fact that the Deposit LDP protects Brynhill golf course land from being built on by housing developers is particularly encouraging. I believe it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

No

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

Representor ID and details: 4338/DP1 Cordelia Gray Harding

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill golf course land from being built on by housing developers is particularly encouraging. I believe it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4339/DP1 Linda Bowler

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4340/DP1 G Humphrey

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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 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 Course Site Reference: 2407/CS1

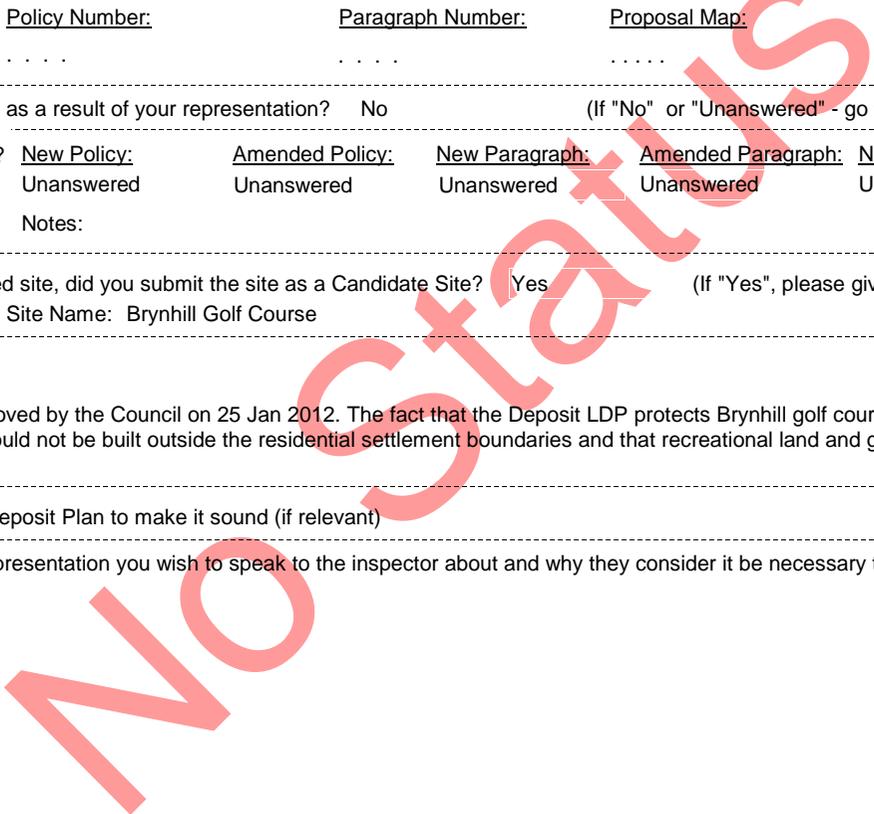
3e - Please set out your representation below:

Deposit Local Development Plan

I would like to show my support for the Deposit LDP approved by the Council on 25 Jan 2012. The fact that the Deposit LDP protects Brynhill golf course land from being built on by housing developers is very encouraging. I believe it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible. I would appreciate if you could acknowledge receipt of my letter.

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 -



Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by Representation ID No.)

Representor ID and details: 4341/DP1 Mr M.J.Lawrence

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4342/DP1 Mr James Mildred

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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:
75. MG2 (26)

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	Yes	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: Land to the west of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
Wenvoe and the Local Development Plan

Is the LDP "sound"?

Do we want a site to be deleted or amended and why?

NO, the LDP is not sound, as it does not take into consideration the effect it will have on current residents' lives or congestion issues. It also fails to take into account the unique heritage of Wenvoe and its strong sense of identity and community. There is not enough emphasis on protecting the countryside.

Wenvoe should not be designated as a "Primary Settlement" as per objective 5.10 of the Deposit Plan (p.28). It states that Wenvoe has "Sufficient population, services and facilities to assimilate growth without it having a detrimental impact on its existing character and local environment". This is quite plainly incorrect. Wenvoe does not currently have the facilities and road infrastructure to cope with this development, which will destroy part of our countryside irrevocably.

Site 26 should be deleted from the LDP for the reasons given below.

Traffic issues

- Clos Llanfair and the bottom of Walston Road are no way wide enough to support in excess of an extra 150 cars accessing the new estate through the village. There is not even a pavement either side of the road at the bottom of Walston Road where it narrows to little over one lane by the church, and with the extra traffic through the village (with the primary school right on the main road) and no pavement at the southern end of Old Port Road, accidents will be far more likely to happen, especially those involving pedestrians and cyclists.
- Wenvoe is already used as a rat-run at peak travel times by people avoiding hold-ups on Port Road (A4050), with bottle-necks at both ends of Walston Road and at the roundabouts on Port Road. The new development would exacerbate the problem two-fold, both with residents and visitors to it cutting through the village, and with cars from outside the village diverting off Port Road between the garden centre and Culverhouse Cross, cutting out more of Port Road than they are currently able to, right through the village.
- Clos Llanfair has been specifically planned and constructed as a model residential cul-de-sac or "close" (hence "Clos") and is composed of eighteen detached executive-style" houses disposed in a non-linear arrangement about a meandering road layout. This arrangement is an effective traffic-calming device, relying on short sight distances and sharp curvature to encourage very low driving speeds and a sense of "arrival": a "landscape" feature which is entirely appropriate to a residential close, but not to a busy through-route serving the needs of 150 houses.

Representor ID and details: 4342/DP1 Mr James Mildred

4. The traffic on Port Road is already extremely heavy and will increase enormously in both directions with another 150 houses on the periphery of Wenvoe village and 220 at ITV Wales. The A4050 is already carrying up to 29,000 cars a day in both directions as it passes Wenvoe. At peak times it can take several minutes of waiting before we can get out from the bottom of our lane onto Port Road (between Morfa Lane and the garden centre). Often we have to wait for someone to actually stop and let us out as there are no gaps between cars, and if we want to turn right across the traffic sometimes we have no option but to turn left and go around the Morfa Lane roundabout in order to get back onto Port Road towards Barry. With access to the estate on Port Road by the garden centre just along from us, I wonder how we will be able to gain access to and from our lane at all.

5. Deposit Plan Written Statement (p.81, point 5) states that a new development will only be permitted where the proposed development "has no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking." Clearly, this development would be in breach of this guideline. The increase in car numbers will definitely increase noise levels and traffic congestion.

6. One of the objectives of the Sustainability Appraisal Report (p.1770, point 6) is to "minimize the causes and manage the effects of climate change" (see also Deposit Plan Written Statement, p.35, point 5.27: "The LDP Strategy also aims to enhance sustainable transport opportunities in order to reduce dependence on the car and ease congestion in the locality.") The report admits that "there will inevitably be a need for future occupiers to travel to access additional services and facilities in Barry/Culverhouse Cross". The majority of people will be doing that by car, which will contribute to climate change.

7. Point 12 of the Sustainability Appraisal Report's objectives (p.1771) is "to reduce the need to travel and enable the use of more sustainable modes of transport". Apart from being able to walk to the small village shop or pub, the residents of the development will need cars to access shopping, secondary schools, doctors, hospitals, dentists and their places of employment, as the buses are very limited and there is no nearby railway station.

8. Deposit Plan Written Statement (p.43, policy 5P7) states that "all new developments that have a direct impact on the strategic transportation infrastructure will be required to deliver appropriate improvements to the network". These improvements are never outlined or discussed and it is never acknowledged that development will lead to an increase in car numbers. Indeed, it appears that a Traffic Assessment will not even be done until the development goes to the planning stages, which seems very much like putting the cart before the horse.

9. Policy MD3 of Deposit Plan Written Statement (p.54, point 9) says that in the design of new development, "proposals will be favoured where they would have safe access to the highway network and would not cause or exacerbate existing traffic congestion". This will clearly not be possible to achieve, either via Clos Llanfair or Port Road.

10. The only provision that appears to be being made to improve the transport infrastructure for Wenvoe is for walkers and cyclists along Port Road (A4050), with no mention of improvements for car users or an improved or expanded bus service to take in Wenvoe (see Deposit Plan Written Statement, pp.96-100, Policy MG2O).
Lack of facilities to support development

1. The Deposit Plan Written Statement states in 5.10 (pp.25-6) that Wenvoe is "considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on the existing character and local environment. Indeed, additional development in these locations will not only help to sustain existing services and facilities but will also provide opportunities for further enhancement". Wenvoe currently has just over 500 houses. An extra 150 will be an increase of nearly a third (ostensibly a modern housing estate tacked onto the edge of a small historic village), thus completely changing and destroying the current balance of the village, which only has one small village shop with space for three cars to park outside, an over-subscribed primary school, a pub, a hotel, a garden centre and a fully-subscribed playgroup. There are negligible job opportunities within Wenvoe, a very poor bus service, no train station, and people are reliant on their cars to access local services outside the village.

2. Sustainability Appraisal Report (p.1769, point 2) states that "the proposed development would support existing services and facilities in the village". In what way? Why will another 150 houses support our very few facilities, apart from a few more people going to the Wenvoe Arms or the newsagent? One of the Sustainability Objectives is "to maintain, promote and enhance the range of local facilities"; it is not explained how 150 extra houses will do this.

3. One of the objectives of the Sustainability Appraisal Report (p.1770, point 5) is "to maintain, protect and enhance community spirit". I would argue that a housing estate of 150 new homes being tacked on to what is currently a small and tight knit community could do exactly the opposite, causing extreme resentment and possible disintegration.

4. Throughout the Council's documents, there is one point that is made repeatedly: one of the Sustainability Objectives is that the Vale should "not act merely as a commuter belt for Cardiff" (Initial Consultation Report, p.156). The Sustainable Settlements Appraisal (p.1) seeks to "assess the need for residents to commute beyond their settlement to employment and retail facilities" and "to measure the potential for a resident's everyday needs for services and facilities to be met within that settlement". The Initial Consultation Report (p.15, point 2.6.7) admits that "there is potential to worsen existing problems resulting from areas becoming commuter settlements". Wenvoe is already essentially a "commuter village" with no job opportunities to speak of, and building another 150 houses will only exacerbate this issue.

5. Deposit Plan Written Statement (p.27, point 5.14) states that primary settlements (of which Wenvoe is one) "cater for the needs of the surrounding wider rural areas. They offer a number of key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the service centre settlements for day-to-day needs." This is utter nonsense in relation to Wenvoe.

6. Wenvoe Church in Wales Primary School is currently over-subscribed. Not all the children in the school come from within Wenvoe itself, but with 220 extra houses at ITV Wales and 150 at the bottom of Clos

Representor ID and details: 4342/DP1 Mr James Mildred

Llanfair, ultimately many children who would previously have attended Wenvoe Primary will have to find places at other schools. No provision in the Deposit Plan Written Statement (p.86, Policy MG1O) seems to be being made for this event, nor does it ever seem to emerge as an issue that the Council has considered. Indeed, when asked about this issue, a Senior Planner in the Council said that "this would be an issue for the Education Department". Again, absolutely no joined-up thinking.

7. Wenvoe is only a small village and has fewer facilities in comparison to the other sites designated as "Primary Settlements" in the LDP. Had Wenvoe been classed as a rural village, Policy MD7 states that "in the interests of creating and maintaining sustainable communities, proposals will only be permitted for sites of 10 units or less". With 220 houses being proposed within the Wenvoe Community at Culverhouse Cross we are already having substantial development quite apart from Site 26.

Impact on the village

1. Consultation Documents (p.84, Policy MG6) state that a new development will only be permitted where the proposed development "is of a scale and form that is commensurate with the surrounding area and does not have an unacceptable impact upon the character and appearance of the locality". The development will clearly not comply with this guideline.

2. One of the Sustainability Appraisal Report's (1771, point 9) objectives is "to protect and enhance the built environment and natural environment" (see also p.34 Deposit Plan Written Statement, Policy SP1, point 6; and p.48 Deposit Plan Written Statement, Policy SP1O). The site is currently green-field, and medium density housing, which is what is proposed for Site 26, would be insensitive to the current housing on the west side of the village. The site also adjoins the Wenvoe Castle historic parks and gardens and is within the Duffryn Basin and Ridge Slopes Special Landscape Area (which the report admits).

3. Point 11 of the Sustainability Appraisal Report's (p.1771) objectives is "to protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage". The report itself admits that the site is right next to an area of ancient woodland, and "in close proximity to" Wenvoe Castle historic parks and gardens. Wenvoe has won the best-kept village prize on several occasions, and it takes pride in its appearance. This proposal does nothing to protect Wenvoe's culture and heritage.

4. The Initial Consultation Report (p.16, point 2.6.10) expresses concerns about the effect on the "character of smaller settlements and whether the areas at the very eastern end of the Vale (Penarth, Llandough) could accommodate significant development given the concerns on congestion, access to services and availability of sites". Wenvoe is another of the most eastern Vale settlements and these concerns are entirely applicable to it too.

Conservation Area issues

1. It seems a strange coincidence that the Conservation Area within the village was shrunk considerably as recently as 2009, corresponding directly with preparations for publishing the LDP. If the previous boundary had been retained, the proposed development would be directly adjacent to part of it, and so could have been seen to "impinge on the historic character" of the Conservation Area, which the Conservation and Appraisal Management Plan opposes. The Sustainability Appraisal Report (p.1771, point 9) states that the site "does not lie within or immediately adjacent to a conservation area", but this is only because the boundary of the Conservation Area has for the first time in its history very recently and conveniently been moved.

2. Conservation Areas In the Rural Vale (1999) states "significant views into and out of the village conservation area should be protected and enhanced where opportunities arise"; and the Wenvoe Conservation and Appraisal Management Plan states that it is "important that new development in or adjacent to the Conservation Area either preserves or enhances the quality of the area". Again, the previous boundary line meant that the views would be completely destroyed from Rectory Close, the southern end of Old Port Road, The Meadows and The Rectory (all within the previous CA boundary). The new boundary conveniently alleviates the council of this issue.

3. A Vale Conservation Officer told me that the first strategic review since the Wenvoe Conservation Area had been designated in 1973 was called for in 2006 (coinciding exactly with the start of preparations for the LDP) because they "realized that there was a lack of evidence-based work on conservation; too much was being done on a case-by-case basis" and that the "timing was entirely coincidental". This now turns out to be untrue, as there was a previous appraisal carried out in 2001, which the officer failed to mention to me, which stated that the then Conservation Area boundary was entirely appropriate as: "The Conservation Area now includes new housing on Walston Road, Church Road and Clos Llanfair. Despite this, it retains an informality and intimacy at the village centre, with few changes to building layout apparent... The designation of a Conservation Area places a duty on the Local Planning Authority to consider the effect of development on the character or appearance of a Conservation Area... This has ensured that the centre remains as one that can fulfil the criteria for designation of a Conservation Area within both government advice and UDP Policy." Since that appraisal in 2001, very little new housing has been built within the previous CA boundary, so it is curious that the Council not only decided a mere five years later that they must have another review, but that this 2006 review decided it was necessary to realign the CA boundary.

4. The Council's sole reason for shrinking Wenvoe Conservation Area seems very flimsy: "It was found that in several places the boundary includes modern development and open spaces of little architectural or historic interest". This is despite the fact that Rectory Close is post-war and already existed in 1973 when the original boundary was drawn up (and obviously in 2001 when the previous appraisal, which maintained the status-quo, was carried out). In addition, two of the "modern" houses that were also in existence at the time of the 2001 appraisal have now been removed from the Conservation Area by it's boundary being shrunk, but have been officially designated as "Positive Buildings". In actuality, there does not appear to be any real concrete reason as to why the boundary has been changed.

5. All extremely convenient when the previous boundary would have run adjacent to about half the length of the new estate, which would have made Site 26 more problematic in terms of its location right next to

Representor ID and details: 4342/DP1 Mr James Mildred

a Conservation Area — other sites were rejected at Stage 2 of the Site Assessment Process because “development of candidate site will have adverse impact on character and setting of Conservation Area”.

Environmental issues

1. The Sustainability Appraisal Report claims that “the site is not within an area prone to flooding”. Wenvoe may not officially be classed as an area at risk of flooding, but the fields earmarked for development are on a steep slope, which regularly becomes very boggy, as highlighted by the abundance of local herons, which eat the frogs from the field. Currently the water drains into the stream, but I would be concerned about the potential for flooding and water run-off should this land be developed.
2. The large increase in cars through the village and on Port Road (A4050) will lead to a massive increase in air pollution.
3. Planning Policy Wales (2002) stipulates that “in planning for housing in rural areas it is important to recognize that development in the countryside should embody sustainability principles, benefitting the rural economy and local communities while maintaining and enhancing the environment”. Proposed Site 26 does none of these things.
4. By developing Site 26, irreversible destruction of the countryside will be taking place whilst the LDP states clearly that it aims to prioritize brown-field sites. Are there really no more suitable sites to build houses on around the unused brownfield areas of Barry or other larger settlements, which would have the facilities necessary to support further growth? The proposed development area consists of fields surrounded by woodland and a stream, a meadow and some woodland. It is home to a huge variety of wildlife, including foxes, badgers, herons and invertebrates.
5. The Green Wedge Background Paper, p.11 states that “Recent landscape studies highlight the gradual degradation caused by the encroachment of the urban form into the open countryside and advise the restriction of development into the rural landscape” and that “the prominent ridge slopes to the north and west of Wenvoe provide a green backcloth to the village”. Some of these slopes, visible from many of the houses on the western edge of Wenvoe, will be lost for ever if Site 26 is developed.
6. It seems very convenient that “the Council has again considered the designation of a Green Belt within the Vale of Glamorgan as recommended by the Planning Inspector in his report on the objections received to the Draft Vale of Glamorgan Unitary Development Plan (November 2000) and its commitment to review such a designation as a part of the 1st review of the Plan. Having considered the matter further, the Council maintains its original position that prior to the designation of a Green Belt, within the Vale of Glamorgan it will be necessary for a sub-regional study to be conducted, to identify development needs and ways of managing change over the next 30 years within the region”; and that “in the absence of, and until such a study has been conducted it is the view of the Vale of Glamorgan Council that the designation of a green belt within the Vale of Glamorgan would be premature and could have a serious detrimental effect upon both the growth dynamics of the region and regional sustainability” (Green Wedge Background Paper, p.20). If the Planning Inspector recommended such a designation back in 2000, why has the Council twelve years later still not begun the studies they say are necessary, but instead continue to employ Green Wedges, which can simply be moved around as the Council sees fit, depending on which particular parts of the countryside they feel inclined to build over at any time?
7. According to the Planning Department, no Environmental Impact Survey has been carried out on Site 26, and yet it is possible that some of the woodland on the site could be “ancient”; part of the site is meadow, which is not even mentioned in the LDP (it categorizes the site simply as “agricultural land”); we know there to be dormice living within a mile of the site; and great crested newts are believed to be on the site.
8. The Council claims that the agricultural land of Site 26 is category 3B, but I have spoken to SEED at the WAG, who confirmed to me that the site has not had a detailed ALC assessment since the new system was brought in 1988. Up until that point, the land classification provisional maps predicted the site to be a mixture of Grade 2 and Grade 3, and in 1994 some soil almost 1km away was subjected to a detailed survey and found to be 3B. But so far only a “desk exercise” has been completed on Site 26 and the Council’s grading of 3B appears to be guessed at from this estimate and the fact that another site almost a kilometre away was 3B. If the site is to be adopted, a detailed assessment should be carried out.

Need for housing

1. I would question whether the Wenvoe community really needs another 370 houses when there are currently 22 in Wenvoe alone (31st March 2012) advertised on Rightmove, ranging upwards from £185,000 in price.

Miscellaneous

1. If it turns out that there is ultimately to be no vehicular access directly between Wenvoe village and Site 26 (as rumours about the Redrow maps already apparently being drawn up would have us believe), the development would be dislocated from the village (or in the Council’s words when rejecting candidate sites, “unrelated to the settlement of Wenvoe and would represent sporadic development in the countryside”). It would literally be a housing estate tacked onto the edge of an already well-integrated and tight-knit community without any real sense of truly being a part of the village.
2. Very worrying that some Vale councillors are complaining about the speed at which the LDP has been implemented and how it will affect congestion and the countryside; some are even claiming that they were not supplied with copies of the LDP with enough time to read and consolidate it properly, but were forced to vote at the full Council meeting on 25th January without proper and detailed knowledge of what

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by
Representation ID No.)

Representor ID and details: 4342/DP1 Mr James Mildred

the LDP contained. The Dinas Powys Plaid Councillor stated in the Penarth Times (and I have since spoken to her directly to confirm these claims) that "many councillors had not been provided with a copy [of the LDP] in advance [of full council meeting on 25th January] and had not been able to read its contents]. If this is the case, the result of the vote on 25th January should be overturned and all Councillors should be given enough time to properly study the LDP in its entirety before another vote takes place.

3. Comparing the Vale's LDP with other councils is very telling, as Cardiff Council, for example, rejects proposed sites for: "harm to rural character"; "traffic and transport concerns"; "poor public transport"; "unspoilt countryside"; and "historic value" — none of which seems to be properly taken account of in the Vale's LDP. If they were, Site 26 would not be being proposed for development as all five of these criteria apply directly to it.

Please see attached Herbert R Thomas Representation

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

Please see both attached Herbert R Thomas representation and document entitled 'LDP Arguments'.

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 -

No Status

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

Representor ID and details: 4343/DP1 Andrew Hilton

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill golf course land from being built on by housing developers is particularly encouraging. I believe it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -



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

Representor ID and details: 4344/DP1 Mr David Lawrence

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by Representation ID No.)

Representor ID and details: 4345/DP1 Mr Michael Sylvester

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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:
75. MG2(26)

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	Yes	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: Land at the West of Port Road, Wenvoe

Site Reference: 2568/CS1

3e - Please set out your representation below:

For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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

For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4346/DP1 Mrs C J James

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I support the local authority's development plan which does not envisage a housing development on recreational land i.e. Brynhill golf club. There are three large schools, a fire station and the local hospital in close proximity to this proposed development, all of which are serviced by one major road (Port Road). This road is barely able to cope with the traffic flow, into and from Cardiff, at the moment, therefore adding more vehicles will only exacerbate an already poor situation. Recreational land is in short supply in Barry so please let it stay in recreational use.

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 -

No Claims

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

Representor ID and details: 4347/DP1 Marilyn Rees

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4348/DP1 Mrs N Herbert

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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)

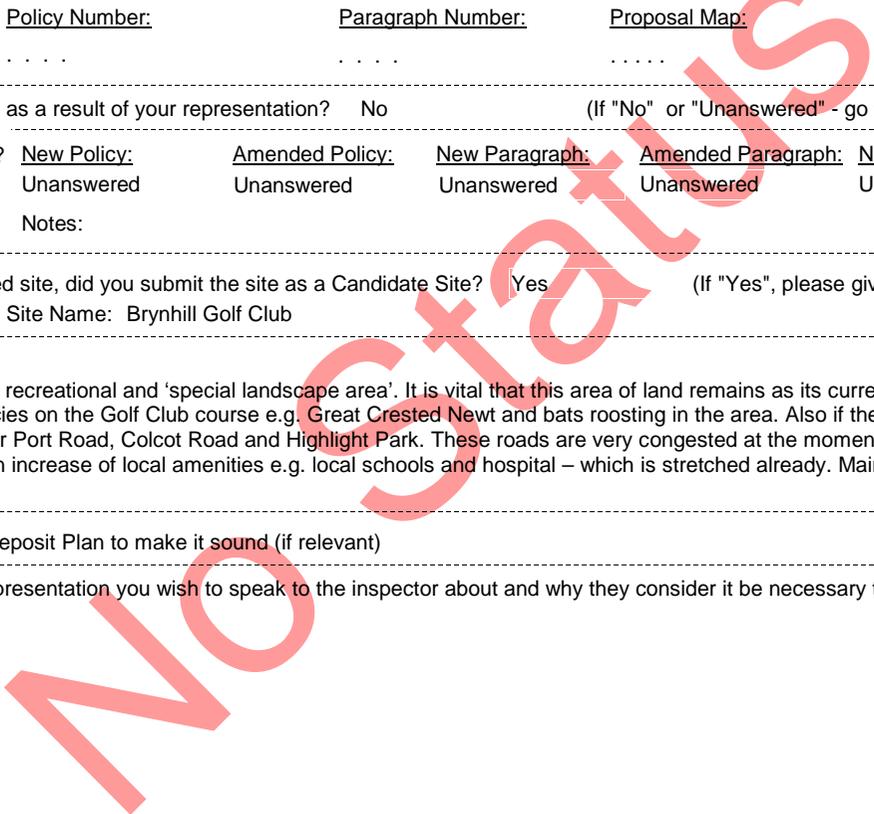
Site Name: Brynhill Golf Club Site Reference: 2407/CS1

3e - Please set out your representation below:

I support the LDP which maintains the land referenced as recreational and 'special landscape area'. It is vital that this area of land remains as its current use. I feel that if this land changed it would have impact on environment as it is cited that there are protected species on the Golf Club course e.g. Great Crested Newt and bats roosting in the area. Also if the land changed and a development replaced it this would cause great traffic congestion to north Barry, but particular Port Road, Colcot Road and Highlight Park. These roads are very congested at the moment and any type of development would just accelerate this dramatically. Also increased housing/traffic would have an increase of local amenities e.g. local schools and hospital – which is stretched already. Maintaining the land as recreational is vital as it is currently this in UDP and LDP will replace this.

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 -



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

Representor ID and details: 4349/DP1 Mr Robert Fishburn

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4350/DP1 W Edwards

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

No

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

Representor ID and details: 4351/DP1 Kathryn S.Bartley

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO

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

Representor ID and details: 4352/DP1 R Weighell

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4353/DP1 Betty Williams

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswered

Notes:

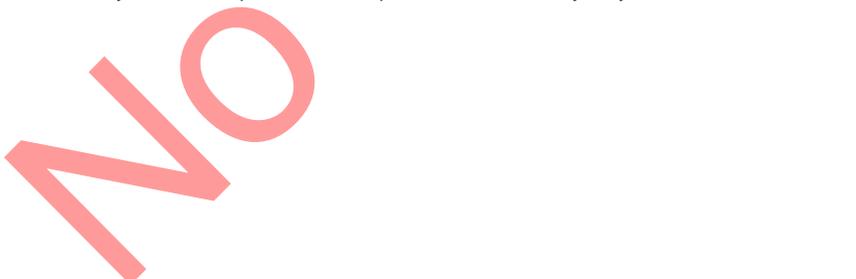
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4354/DP1 Mrs Patricia Bird

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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 Clyb Site Reference: 2407/CS1

3e - Please set out your representation below:

I support the Deposit LDP which was approved by the Council on 25th January 2012. The Deposit LDP protects Brynhill Golf Course land from being built on by housing developers and I approve of that. In my view, I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4355/DP1 Mr Matthew Batey

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAFF

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

Representor ID and details: 4356/DP1 Patricia Kinch

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4357/DP1 Mrs Norma Cannan

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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)

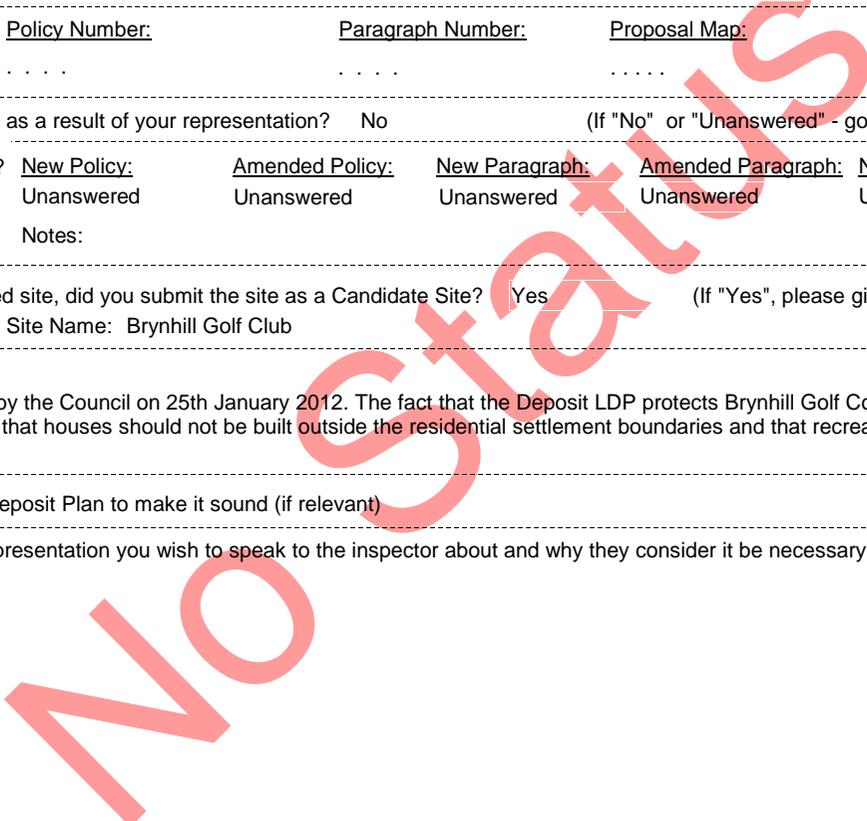
Site Name: Brynhill Golf Club Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25th January 2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -



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

Representor ID and details: 4358/DP1 Mr Aubrey Cannan

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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)

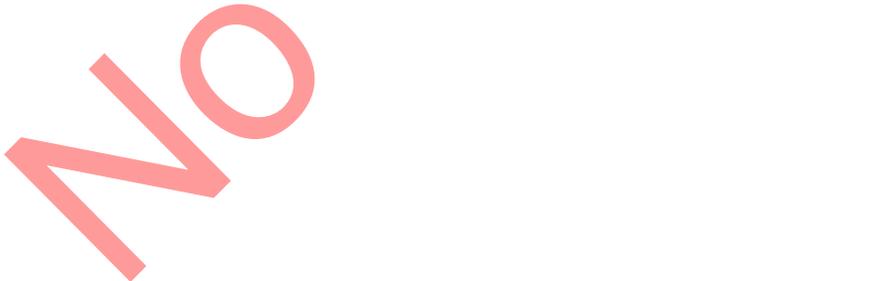
Site Name: Brynhill Golf Club Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -



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

Representor ID and details: 4359/DP1 Mr Stuart Rees

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4360/DP1 Mrs S Lewis

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4361/DP1 Ms Rachel Noble

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAFFS

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

Representor ID and details: 4362/DP1 Ms M.Webber

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4363/DP1 Mark Powell

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
.....

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	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)

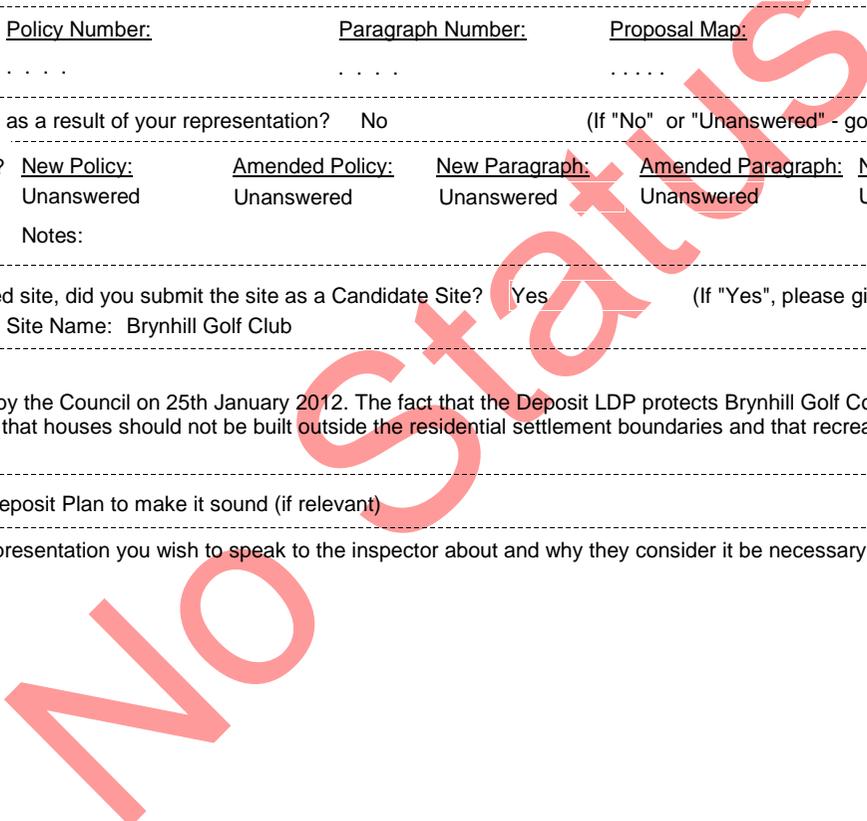
Site Name: Brynhill Golf Club Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25th January 2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -



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

Representor ID and details: 4364/DP1 Debbie Rees Adams

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4365/DP1 S Powell

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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 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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4366/DP1 Mr Paul Rees Adams

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAFFS

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

Representor ID and details: 4367/DP1 Emma Norman

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4368/DP1 Mr A Grimes

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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 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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/2012. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4369/DP1 Mr Darren Bourne

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4370/DP1 T Hewings

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit LDP approved by the Council on 25/1/12. The fact that the Deposit LDP protects Brynhill Golf Course land from being built on by housing developers is particularly encouraging. I believe that it is very important that houses should not be built outside the residential settlement boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

No

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

Representor ID and details: 4371/DP1 Mrs Siriol Roberts

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4372/DP1 Mr D Hewings

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
30/03/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Sound

2b - If you think that the Plan is unsound and does 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? No (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	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 Site Reference: 2407/CS1

3e - Please set out your representation below:

I wish to show my support for the Deposit L.D.P. approved by the Council on 25/1/12. The fact that the Deposit LDP protects Brynhill Golf Course ladh from being built in by housing developers is particularly encouraging. I believe it is very important that houses should not be built outside the residential settleemnt boundaries and that recreational land and greenbelt should be protected wherever possible.

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 -

NO

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

Representor ID and details: 4373/DP1 Jeffrey Thomas

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
MD12. . . .	0.0 - All. Dated Feb 2012	Appendix 9 - Supporting Documents. . . .

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	Yes	Unanswered
<u>Notes:</u>					

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)

<u>Site Name:</u> Land East of Llangan	<u>Site Reference:</u> MG 9 / ID 22 Appendix 1
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3e - Please set out your representation below:

I understand that the proposed new site has been designated as "brownfield" which I find startling as to my knowledge in the last 30 years has only been used for sheep / cattle / horse grazing. I understood brownfield to be abandoned industrial or commercial facilities which could be developed. My other concerns focus on the local school which is full, the total lack of local amenities and the nature of the access which is off a narrow single track lane which has always been prone to flooding. There is no local employment. Contrary to government legislation regarding gypsy / travellers site on green belt land. All water travels via drainage ditches and during heavy rainfall the development field is prone to hold large amount of water and flood.

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

Removal of the proposed site MG9 from the plan.

Presumably if this site is passed for development all green belt land surrounding it could be classes as "brownfield" and be developed.

Every site to be assessed in the same way as affordable housing to have a fair and even decision for all.

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 -

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

Representor ID and details: 4374/DP1 Llywela Evans

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4375/DP1 Lorna Antuch

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness 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. . . .	0.0 - All.

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):
Yes	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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Former Garden Emporium Site Reference: PG2

3e - Please set out your representation below:

Test P1 "Soundness"
There has been no correspondence to allow the building of 40 houses. 12 had been approved yet no indication that there is an increase in site.

Test P2
The development is unsustainable:
* site providing housing where there is no real need, transport links are poor
* strain on roads, schools, doctors etc.
* habitats will be destroyed

Test C2
The plan does not have regard to national policy

1. It is in rural vale - open countryside, no shops, jobs, and poor public transport

Test CE1

1. Unsustainable with lack of opportunities for jobs, living and socialising
2. Climate change effect will increase as cars will need to be used for people to meet their daily needs
3. Poor public transport
4. Habitat conservation lost, required in a rural area.
5. Pressure on local services and facilities in particular Llangan Primary School.
7. Meet housing needs- no need for housing development of this site at this location
10. The rear part of the site has not previously been built on and is greenfields.

Test CE2
-Fferm Goch is wrongly classified as a minor rural settlement and the size of this building is totally disproportionate to the size of he local population.

Fferm Goch has consistently been refused by Council planning applications to date as

Representor ID and details: 4375/DP1 Lorna Antuch

- * lack of sustainability
- * lack of social infrastructure
- * lack of employment
- * very poor public transport
- * preservation of a rare plant

All the above are still exactly the same and thus allowing planning would be unjust and unfair.

2. Poor public transport and this requires a private car to access many services, these services are infrequent.

3. Local infrastructure under pressure and will not serve 40 new houses

- * lack of space at Llangan School
- * lack of local jobs, lack of shops and services within walking distance.

4. Scale

The development of this site is out of proportion with only 33 houses in the locality totally out of scale it is not infill or minor extension.

Over development - 12 houses is acceptable and 40 would make the site crowded and out of keep with a rural area.

Previous 42 and 24 houses for development but rejected by the Council as overdevelopment and damage the character of the area.

Bithynian Vetch grows on the site and development of the site would result in loss of this rare plant species.

Fferm Goch is not a minor rural settlement it is a hamlet with a population of only 98 - the site is unsustainable in a rural area.

Test C3

The site is unsustainable for the reasons mentioned above.

Test C4

It does not have regard to the relevant community strategy priorities

"2,3,4,5,6,7 and 10"

- no employment opportunities
 - no health service near the site
 - lack of habitat management
-

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

The scale of this development is not in proportion with the local area facilities, and it would more than double the number of houses. The existing planning for 12 houses should remain and no plan to allow the number to increase as this would be disproportionate development with the local area. Thus no increase in size of development and 12 houses to remain with no further properties on this 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 -

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

Representor ID and details: 4375/DP2 Lorna Antuch

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes

3a - Which part of the Deposit Plan are you commenting on?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
MD12. MG9. . .	0.0 - All. Constraints Map Feb 2012	Appendix 9 - Supporting Documents. . . .

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Yes	Unanswered	Unanswered	Yes	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: Land east of Llangan Site Reference: MG9 / ID 22 Appendix 1

3e - Please set out your representation below:

My objections are based on lack of soundness from the LDP.

1. Test P1

The LDP was not proposed using the Community Involvement Scheme, i.e. –
 - no consultation with emergency services
 - Llangan primary school

Both of the above would be significantly impacted

- no consultation with strategic partners in providing gypsy and traveller sites
 - no consultation with registered consultees during the consultation stages
 - no consultation with the local community about the proposed gypsy and traveller site, only consulted as I read the LDP, no other form of contact from local authority or Welsh Government.

Test P2

MG 9 is inconsistent with proposed LDP policies
 MG 9 allocation is unsustainable and the Llangan site does not meet National Policy
 Lack of consistency as previously there has been rejections in view of the sustainability issue (e.g. Bonvilston September 2011)

Test C1

The housing strategy does not indicate any structure for assessing the needs, amenities and location of a gypsy and traveller site

Test C2

Representor ID and details: 4375/DP2 Lorna Antuch

Site allocation MG 9 does not conform to national policy.

1. Unsustainable
 - no local shops
 - no health centre
 - no transport

The area is rural and thus due to lack of amenities also unsustainable.

2. Scale
 - at present small resident community of less than 100 people in Llangan the proposed site could almost double the population
3. Score of 0 points is evidence in sustainable settlements appraisal

The proposed MG9 site is too small and thus will be unable to meet the needs of the gypsy and traveller community.

The designing gypsy and travellers sites good practice guide also expects the standards that are set out for social housing in a settled community, the scale of this proposal is unsustainable in the local community.

It does not take into account that joint residential and transit sites are not preferred by the gypsy and traveller community (recommended by Travelling to a Better Future)

Test C3
Lack of regard to the Wales Spatial Plan
- MG 9 has lack of access to key facilities, amenities, doctors, shops, schools, etc, due to the lack of services in the neighbouring villages. Without the above access there is no sustainability in the development and thus does not meet with the key objectives of the Wales Spatial Plan

Test C4
Lack of regard to relevant Community Strategy
- MG9 has no public transport, no healthcare, employment, retail thus is again unsustainable.

Test CE1
No coherent strategy which its policies and allocation logically flow.
MG9 is in agricultural open countryside, it has inadequate facilities and transport links. It is agricultural land in the Special Landscaped area.
However the LDP says that it will provide policy framework which:
Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations.
Reduces cut commuting by providing opportunities for new housing retail and employment development in accessible locations in the Vale of Glam.
The allocation of MG9 does not comply with the following objectives:

Objective 1: To sustain and further the development of sustainable communities within the VoG, providing opportunities for living, working and socialising for all. The sites location does not meet with this.

Objective 2: To ensure that the development within the Vale of Glamorgan makes a positive impact/contribution towards reducing the impact of and mitigating 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 greater access to 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 state "It is a proposal that would adversely affect the

Representor ID and details: 4375/DP2 Lorna Antuch

undeveloped rural character of the area".

Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan – Llangan Primary School has not been consulted and does not have capacity for more children.

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 SITE IS NOT and this brings Policy MD12 which is discriminatory in that gypsy and traveller sites are treated differently from other housing allocations. Thus an inclusive policy would see that gypsy and traveller sites are 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 future resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the uses 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 the relevant alternatives and are not founded on robust evidence.

1. The allocation of Llangan is on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
2. The gypsy and traveller sites assessment conflicts with other evidence based on background papers i.e. Sustainable Settlement Appraisal, which states 0 points for public transport however the gypsy and traveller site assessment states this as good.
3. The site assessment states "good highway access" yet it is 2.5m which is far shorter than the minimal requirement for vehicle access of 3.7m plus a 1.2m width for footpath.
4. The site assessment does not reflect the current legal obligations of the council yet other site assessments highlight legal issues.
5. Several private sector sites were put forward as candidate sites but were dismissed as they were not in council ownership. Why ask the private sector if they will not even be considered.
6. The site allocation does not reflect the identified need of the gypsy and traveller community as highlighted by the Fordham report.
7. The site assessment suggests Fferm Goch is the local settlement however Llangan is recognised as the local settlement, only 150m away from the proposed site and is on the historic documents.
8. Site assessment does not reference that the proposed site is in a Special Landscaped Area.
9. The site assessment also makes no reference that the site is adjacent to a Conservation Area, the conservation management plan there is a specific requirement to protect the view from the edge of the conservation area over this proposed site.
10. Fferm Goch is allocated as a Minor Rural Settlement is questionable. 9 points were scored – 3 employment (same as major settlements e.g. Barry). This score of 3 is based on 4 industrial units which employs less than 15 people with no new jobs in last 9 years and no intention to expand.
11. Fferm Goch has a population of 98 yet is classified as a minor rural settlement the other 5 sites with a population of less than 100 are classified as hamlets. There is a presumption against the development of hamlets or the scale would need to be appropriate.
12. The Vale's Fordham ~Study/Report found that gypsy and traveller community wanted smaller sites located on the fringes of larger communities. N.B. The report confirmed that isolated, rural sites restricted access to health, education and welfare facilities that disadvantaged them and need to be seen in light of the objectives.
13. An independent highway study surrounding the proposed site concluded
"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsustainable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within the rural environment."

Representor ID and details: 4375/DP2 Lorna Antuch

"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 school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or the infirm and could be potentially hazardous."

"Welsh Government guidelines state that 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 would also have ready access to schools, doctors and shops against which requirements Llangan sites appear to fail.

MG9 allocation is totally inconsistent with the proposed policies.

Test CE3

Site management – in Rover Way 21 unit site has 3 full time staff yet the Vale of Glamorgan have made no indication of how they will manage the site.

2. No strategy that monitors how the gypsy and traveller community will be monitored in growth and need yet the current housing strategy is almost expired (April 2012).

Test CE4

MD12 policy is discriminatory. It does not allow for flexibility for VoG to put forward sustainable sites for the gypsy and traveller community through policies derived in the plan.

MD12 requires redrafting to make sustainable smaller sites and be included with the affordable housing requirements. Private sector options need to be considered as there may be more sustainable options.

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

1. The first change is to remove the proposed MG9 site from the plan and instead suggest an alternative site that is more practical and sustainable be found and implemented.
 2. Assessment of gypsy and traveller sites in direct accordance with the way in which affordable housing is assessed.
 3. Amendment of the MD12 policy against any discrimination of the gypsy and traveller community.
-

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 -

No Status

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

Representor ID and details: 4376/DP1 Mr Anthony David Escott

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
74. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAFFS

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

Representor ID and details: 4377/DP1 Richard Antuch

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes

Coherence and Effectiveness 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. . . .	0.0 - All.

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):
Yes	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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Former Garden Emporium at Fferm Goch Site Reference: PG2

3e - Please set out your representation below:

TEST P1

It is understood that in respect of the test of 'soundness':

- There has been a failure to involve the local community in the decision to allocate 40 houses on the site.

TEST P2

It is submitted that the proposed development is unsuitable in respect of sustainability, including because:

- It seems that the site seeks to provide housing for which there is no real need in the area.
- The proposed development is likely to place a strain on existing local facilities, such as the school (which it is understood has no spaces in any event), as opposed to enhancing the area.
- It is understood that there are habitat management issues involved should the whole site be developed.
- Apart from the school and community hall, all other services and local amenities can only be accessed by using motosed transport. The local bus service is very poor.

TEST C2

The plan 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:

- It is located in the Rural Vale, surrounded by open countryside. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, etc. 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.

It is understood that 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', which it is submitted that the proposal for 40 houses would not meet

Representor ID and details: 4377/DP1 Richard Antuch

- The Garden Emporium site is very poorly served by public transport -there is only a very limited bus service to and from Fferm Goch. There is no bus service to the nearest train station at Pencoed.

It is understood that 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).'

It is understood that 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', and also 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.'

- 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. The burden on the highways infrastructure would be increased significantly with 40 houses being placed on the site given the dramatic percentage increase it would have on the housing in the area.

It is therefore understood that this 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 understood that this 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...
- 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 Lliardi combined (which amount to 33 houses). It is totally out of scale for this area.

It is understood that 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 over-development of this site at a density which should not be permitted in this location. The following points are relevant:

- 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.

-However, 40 houses will make the site crowded and out of keeping with the rural area.

-It is understood that the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

It is understood that this is contrary paragraph 9.2.12 of PPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' It is further understood that paragraph 9.2.22 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', and that in paragraph 9.3.4 PPW it 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.

- If 40 houses are built on the Garden Emporium Site, it is understood that 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. This would be endangered if 40 houses were to be placed upon the site.

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.

Representor ID and details: 4377/DP1 Richard Antuch

It is understood that this is an incorrect designation (which is considered further in Test CE2 below) and 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 (as cited above). 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)

It is understood that 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

It is understood that 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 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 CE1

It is understood that 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.

It is understood that 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

Representor ID and details: 4377/DP1 Richard Antuch

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.

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

It is understood that 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 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.

- it is the smallest of the “Minor Rural Settlements” with only 98 residents (nb 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.
- 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 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

Representor ID and details: 4377/DP1 Richard Antuch

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 we would strongly suggest 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 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 Liangan 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.’

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.

• 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 LOP. 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.

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. It is understood that the draft LOP, 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).

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.

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

The planning permission previously granted for the building of 12 houses on the site should remain in place without amendment for an increase for further properties on the 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 -

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

Representor ID and details: 4377/DP2 Richard Antuch

Date Lodged	Status	Petition and No.	Supporting Evidence	Additional SA SEA	Rep format:	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination?
02/04/2012	M	<input type="checkbox"/> 0	<input type="checkbox"/>	<input type="checkbox"/>	Comment form	Written

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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 - Yes
Coherence and Effectiveness 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:
MD12. MG9. . .	0.0 - All. Feb 2012	Appendix 9 - Supporting Documents. . . .

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):
Yes	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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land east of Llangan Site Reference: MG9 / ID 22 Appendix 1

3e - Please set out your representation below:

TEST P1

- There has been a lack of consultation with the community, contrary to the Community Involvement Scheme. It is also understood that the local primary school and emergency services were not approached about the proposed site.

TEST P2

- It is understood that the appraisal of suitability is flawed and contradictory.

TEST CI

- It is understood that the Land Use Plan does not relate to any strategy, with regard to Gypsy & Travellers and that the Housing Strategy is out-dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TEST C2

- It is understood that the Site allocation, with regard to Gypsy & Travellers, does not have regard to National Policy:

o Welsh Government Circular (3012007)

It is understood that:

- The site is RURAL and is "unsustainable" as there are no local services (shops, transport; health etc).
- 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.
- It is understood that a recent application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- It is also understood that the VoG has refused an application in Bonvilston on the basis of Sustainability and services were closer to this site.

O Designing Gypsy and Traveller Sites Good Practice Guide – It is understood that the site is too small; therefore cannot meet the needs identified in the LDP.

O Planning Policy Wales

It is understood that the site:

- Is a greenfield land. This land has only been used as agricultural land as far back as can be remembered. It is therefore not understood how the proposed site could be developed in such a way. If the site is identified as a brownfield site, this would appear to equally apply to a lot of the land in the area, suggesting that other land could also be used for development;
- There will be a need for those to travel using motor vehicles as there is very limited public transport facilities, thus adding congestion to the road in the area (particularly given the percentage increase the site

Representor ID and details: 4377/DP2 Richard Antuch

till create in the area population);

- 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

- It is understood that the policy does not have due regard to the Wales Spatial Plan.

O It is understood that a key theme of the Plan (Wales Spatial Plan) is to achieve sustainable development by focusing new development in areas which have good access to key services and facilities. The MG9 is therefore not consistent with the Wales Spatial Plan.

TEST C4

- It is understood that the plan does not have regard to the relevant Community Strategy on the basis that the site will lead to heavy emphasis on the use of cars and the like to access local facilities (such as shops, doctors etc.), and the fact that there is no employment available in the area.

TEST CE1

- The Plan does not set out a coherent strategy which its policies and allocation logically flow. It is also understood that 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 would not appear to meet these objectives being in a Rural Location with inadequate facilities and transport links.

O It is understood that the Allocation of MG9 would not comply with the following objectives:

- To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all.
- 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.
- 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.
- To protect and enhance the Vale of Glamorgan's historic, built, and natural environment it is understood that planning was refused on an adjacent site in around May 2002 as it was considered that there would be an adverse impact on the undeveloped rural character of the area.
- To maintain, enhance and promote community facilities and services in the Vale of Glamorgan — Lack of consultation.

TEST CE2

- It is understood that the strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence. It is understood that:

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 states "good highway access", yet the access appear to fall short of the requirements for vehicle access.
3. The site allocation does not reflect the identified need of the G&T community.
4. The G&T site assessment apparently suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 15Dm from the proposed site.
5. The assessment apparently makes no reference that the site is adjacent to a Conservation Area.
6. The allocation of Fferm Goch as a Minor Rural Settlement is questionable. It is understood that Fferm Goch has a population of less than 100, which would seem to suggest that it should be classified as a Hamlet, in respect of which it is understood there is a presumption against development. It is understood that 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.
7. It is understood that an independent highway study surrounding the proposed site has concluded that the site is not suitable.

TEST CE3

- It is understood that the Vale of Glamorgan Council make no reference as to how they are going to manage such a large site, such as employed staff etc.
- It is understood that 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.

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

- The site, MG 9, should be removed from the present plan and another site be sought as an alternative which meets the relevant sustainability criteria.

- Policy MD 12 should be amended so not to discriminate against the community of gypsies and travellers. Sites during the plan ought to be assessed on a basis such as that applied in respect of social housing.

Representor ID and details: 4377/DP2 Richard Antuch

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 -

No Status

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

Representor ID and details: 4378/DP1 Julie Lawrence

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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NO STAIRS

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

Representor ID and details: 4379/DP1 Clare Corcoran

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

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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

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<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
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Notes:

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NO STAIRS

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

Representor ID and details: 4380/DP1 S.Mitchell

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

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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

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<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
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Notes:

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NO STAIRS

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

Representor ID and details: 4381/DP1 Helen Thomas

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

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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

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Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswered

Notes:

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NO STAIRS

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

Representor ID and details: 4382/DP1 Nicola Harris

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

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Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Yes

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Notes:

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NO STAIRS

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

Representor ID and details: 4383/DP1 Mr Paul Harris

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
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Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Yes

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Notes:

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NO STAIRS

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

Representor ID and details: 4384/DP1 Alan D French

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
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Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Yes

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Notes:

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NO STAIRS

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

Representor ID and details: 4385/DP1 Mr M.Cleary

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

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Notes:

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NO STAIRS

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

Representor ID and details: 4386/DP1 Mr Gary Smith

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
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NO STAIRS

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

Representor ID and details: 4387/DP1 Tim Theobalds

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

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Notes:

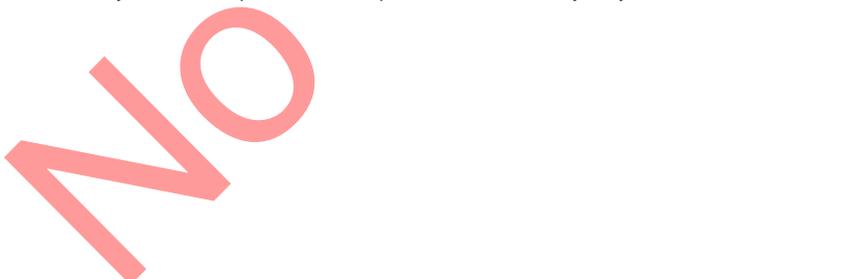
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4388/DP1 Mrs M T Thomas

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4389/DP1 Mrs L.Smith

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4390/DP1 Roy Thomas

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4391/DP1 Lynda Davies

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4392/DP1 Mr Nick Courtier

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4393/DP1 Ruth Evans

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswered

Notes:

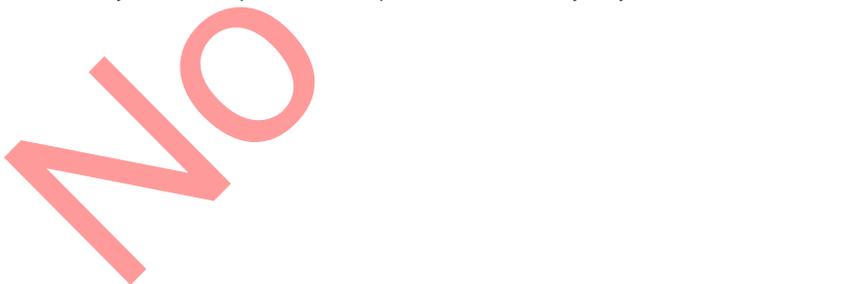
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS: (ordered by Representation ID No.)

Representor ID and details: 4394/DP1 Mr Phillip Jones

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4395/DP1 Jonathan Thomas

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4396/DP1 Mrs K.Hadley

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4397/DP1 Suzanne Campbell

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4398/DP1 Ms Lisa Bellamy

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STATED

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

Representor ID and details: 4399/DP1 Charlotte Davies

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4400/DP1 Michelle Langdon

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4401/DP1 Daphne Davies

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4402/DP1 Nicola Hicks

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4403/DP1 Mr & Mrs M Edwards

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4404/DP1 L.Bagshaw

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4405/DP1 Lisa Roberts

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4406/DP1 Edwina Davies

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4407/DP1 Gwenno Roberts

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4408/DP1 Lauren Morgan

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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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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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 -

NO STAIRS

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

Representor ID and details: 4409/DP1 Martin Williams

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4410/DP1 Mr Alan Palfrey

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswered

Notes:

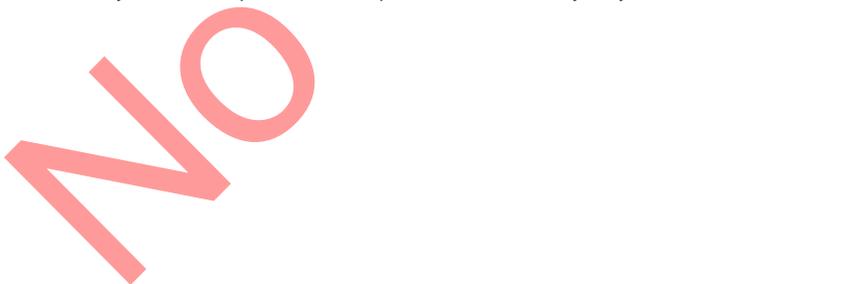
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4411/DP1 Mrs Susan Williams

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4412/DP1 Helen Morgan

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4413/DP1 Iwan Davies

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4414/DP1 Dorothy Peregrine

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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NO STAIRS

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

Representor ID and details: 4415/DP1 W G Breese

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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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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NO STAIRS

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

Representor ID and details: 4416/DP1 Mr Michael Clive Webb

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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NO STAIRS

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

Representor ID and details: 4417/DP1 Susan Gittens

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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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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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 -

NO STAIRS

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

Representor ID and details: 4418/DP1 Mr Mark Gale

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS: (ordered by Representation ID No.)

Representor ID and details: 4419/DP1 James Harris

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4420/DP1 Joanne Fidling Lewis

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswered

Notes:

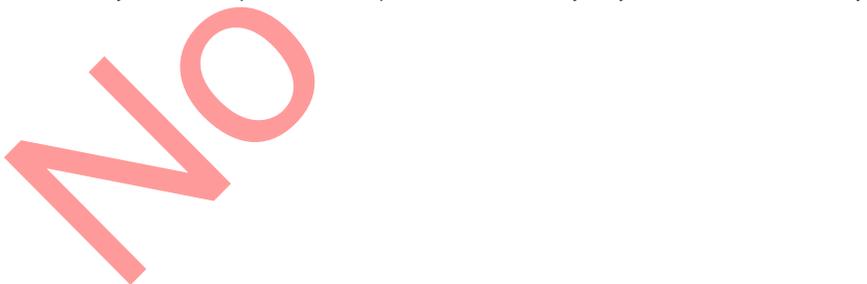
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -



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

Representor ID and details: 4421/DP1 Mrs Linda Hurst

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4422/DP1 Mr David Thompson

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4423/DP1 Mrs Anne Boddy

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS:

(ordered by Representation ID No.)

Representor ID and details: 4424/DP1 Mr Neil Cunningham

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4426/DP1 S Breese

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4427/DP1 Paul Trotman

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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NO STAFF

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

Representor ID and details: 4428/DP1 Vicky Roylance

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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NO STAIRS

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

Representor ID and details: 4429/DP1 J Davies

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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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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NO STAFF

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

Representor ID and details: 4430/DP1 S.I.Williams

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswered

Notes:

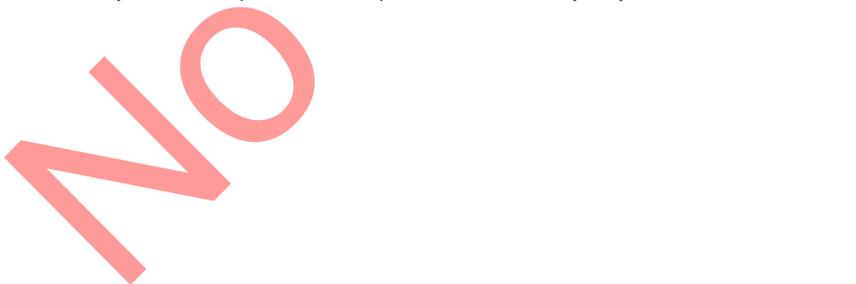
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS: (ordered by Representation ID No.)

Representor ID and details: 4431/DP1 Louise Clarke

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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NO STAIRS

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

Representor ID and details: 4432/DP1 Mr Ryland Griffiths

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4433/DP1 Mrs J Fallas

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAFFS

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

Representor ID and details: 4434/DP1 Gail Griffiths

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4435/DP1 Mrs K Hayer

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4436/DP1 Denise Samways

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached.

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 -

NO STAIRS

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

Representor ID and details: 4437/DP1 Mrs Bassam Fallas

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <input type="checkbox"/> Written
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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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 -

NO STAIRS

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

Representor ID and details: 4438/DP1 Mr Graham Samways

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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)

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<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

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NO STATED

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

Representor ID and details: 4439/DP1 Mr John Day

<u>Date Lodged</u>	<u>Status</u>	<u>Petition and No.</u>	<u>Supporting Evidence</u>	<u>Additional SA SEA</u>	<u>Rep format:</u>	4a - do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of Public examination? <u>Written</u>
02/04/2012	M	<input type="checkbox"/> 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comment form	

2a - Do you consider the LDP is Sound? Unsound

2b - If you think that the Plan is unsound and does 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?

<u>Policy Number:</u>	<u>Paragraph Number:</u>	<u>Proposal Map:</u>	<u>Constraints Map</u>	<u>Appendices:</u>
75. MG2(26)

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?

<u>New Policy:</u>	<u>Amended Policy:</u>	<u>New Paragraph:</u>	<u>Amended Paragraph:</u>	<u>New Or Amended Site:</u>	<u>Other (see Notes):</u>
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 Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)

Site Name: Land at the West of Port Road, Wenvoe Site Reference: 2568/CS1

3e - Please set out your representation below:
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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 -

