

Vale of Glamorgan Local Development Plan

Appendix 11: Residential Allocations – Representations Summary and Council's Composite Response Report

(2015)

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1. Introduction

This summary report sets out the Council's response to representations made in respect of the LDP housing allocations proposed under Policy MG 2. It responds to the generic areas of concern and common themes raised in representations on housing allocations. This is followed by responses to site specific matters that were raised to each proposed allocation which is shown in site allocation order in the table below.

2. Background

The Deposit LDP under Policy MG2 sets out the Council's housing allocations which it considers offers the most sustainable approach to meet the Vale of Glamorgan's identified housing requirements and future development needs up to 2026.

The housing sites were selected from 420 'candidate sites' submitted to the Council during the call for such sites held between December 2006 and January 2007, including the additional submissions that were accepted until February 2008. In addition to sites submitted for consideration, the Council identified several other sites for development which are included within the list of Policy MG2 allocations.

To assist in reaching its determination on the most suitable and deliverable sites to support the LDP strategy and meet the identified housing need, all sites submitted have been subject to the Council's Site Assessment Process. As part of this process the sites listed in Policy MG2 have been the subject of detailed consultations with statutory consultees and utility providers such as National Resource Wales and Dwr Cymru Welsh Water, alongside input from the Council's Conservation, Biodiversity and Highway officers. The results of the site assessment process are set out in the Council's "Findings of the Site Assessment Process" Background Paper (2013). The list of sites included in Policy MG2 have also been subject to Sustainability Appraisal (SA), details of which are provided at Appendix 14 of the Sustainability Appraisal Report (2013).

3. Summary Representations to MG2 Housing Allocations

There were a total of 1707 objections to Policy MG2 with 247 objecting to general matters relating to the housing allocations policy, such as the overall distribution of allocated sites. A total of 1460 representations related to specific site of which 1394 were objections, 37 were in support and 29 made general comments.

The majority of representations objecting to the LDP (60% of objections) were made in relation to Policy MG2. The majority of the objections raised requested the deletion of the housing allocation, citing site specific matters, such as highway constraints, flooding and the impact on local services. A number of representations objected to the distribution of housing amongst rural settlements while others considered the proposed size of allocations to be disproportionate when compared to the size of the original settlement. The following sections provide the Council's responses to these common themes and objections received on the Deposit LDP housing allocations. This is followed by responses to the site specific objections raised which are presented in site allocation number order.

3.1 Impacts of new development

3.1.1 Impact of additional traffic generated by the proposed housing developments

One of the key issues raised within the majority of representations on the proposed housing allocations is the potential increase in traffic and the resulting impact that this would have on the existing roads and junctions, both within the immediate vicinity of the development and on the wider highway network. In making this objection, representors highlight the current traffic congestion experienced at peak hours along key commuter

roads and local roads near to schools. Concerns were also raised with regard to highway safety matters in providing access to the proposed housing allocations and the potential increased risk to pedestrians and cyclists.

Objections were also made in respect of the public transport provision within the Vale of Glamorgan to assist in reducing the impact of development, these considered that existing levels of provision are a key factor in current traffic congestion experienced. The perceived lack of public transport was an issue raised in relation to the majority of allocations within both urban and rural areas.

In making these objections, representatives cited the need for infrastructure and service improvements to address current problems prior to any additional housing taking place. Objections also raised concerns in the absence of detail as to how the planned housing developments would address current and future traffic issues.

A number of representatives challenged assumptions made in the Council's Highway Impact Assessment of Deposit LDP Proposals background document questioning the findings of the report and the potential increase in traffic associated with the proposed housing development.

Council Response

The Council's Highway Impact Assessment background paper (2013) examines the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP. This study examined peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals and their cumulative impacts.

The study highlights that a number of junctions within the Vale are currently at or above their threshold capacities, and in this respect the findings of the assessment support the objections which identify issues with peak time congestion at some road links and junctions. However, the purpose of the LDP is to both facilitate and manage development in a manner which ensures that future development proposals do not exacerbate existing problems or create any unacceptable impacts.

Accordingly, the aim of the Highway Impact Assessment is to identify the potential impact on the strategic highway network so that the Council can justify the requirement for each housing development to provide appropriate highway and other transport infrastructure improvements to meet the demands of development planned. Appendix 5 of the LDP sets a requirement for proposed housing developments to undertake a *"robust Transport Assessment that evaluates and determines mitigation measures which alleviate any detrimental future impact future development proposals will have on the local highway network and associated road junctions"*.

This responds to one of the main areas of concern, that there is a lack of detailed highway and transport improvement proposals to accommodate future residential developments. In this respect, it would be for the developer to provide detailed design proposals at the planning application stage. The developer would also need to identify any detailed improvement schemes to ensure their proposals would be acceptable. Where specified, such proposals would need to be based on a robust Transport Assessment (TA) and which would need to satisfy the Council that the highway proposals are appropriate to accommodate the anticipated levels of traffic generated, consistent with Appendix 5 and the other policy requirements of the LDP such as Policy MD3 (Design of New Development).

Therefore, the Council considers that there is sufficient information regarding the potential increase in demand on the highway network generated by the proposed housing needs of the LDP. The Highway Impact

Assessment background paper provides sufficient detail on the likely traffic impact of development so that the Council can require developers to provide the necessary and appropriate transport improvements to accommodate planned housing growth in the Vale of Glamorgan.

With regard to improvements to public transport improvements, LDP Policy SP7 (Transportation) and Policy MG16 (Transport Proposals) identify a range of transport improvements which will assist in alleviating existing congestion and provide the opportunity to encourage greater public transport use. Additionally, through Policy MD4 (Community Infrastructure and Planning Obligations) the Council will secure appropriate transport infrastructure to include public transport services and infrastructure that facilitates sustainable transport including walking and cycling.

Consequently, the Council considers that representations raising concerns relating to increase in traffic congestion can be addressed through the application of the LDP's policy requirements. In this respect the LDP enables the Council to ensure that future development mitigate the anticipated impact on the Vale of Glamorgan's highway network.

3.1.2 Noise and Air pollution

A number of housing allocation representations raised concern over the potential increase in noise and air pollution associated with increased traffic generation from the future use of sites.

Council Response

In preparing the LDP the Council has consulted with Natural Resource Wales (NRW) who have not raised concerns regarding the increases in noise and air pollution arising from proposed site allocations. In addition, no concerns have been raised by the Council's Environmental Health department on this issue.

Notwithstanding this, the LDP through policies, such as policies SP7 (Transportation), MG16 (Transportation Proposals) and MD4 (Community Infrastructure and Planning Obligations), enable the Council to secure sustainable transport improvements and encourage walking and cycling to reduce the reliance of car journeys. The promotion of sustainable transport will also be a consideration within the design and layout of development proposals through policies MD 2 (Place Making) and MD 3 (Design of New Development).

Additionally, Policy MD8 Environmental Pollution requires developers to demonstrate that their proposals "will not result in an unacceptable impact on people, residential property and / or neither the natural environment from either pollution of land, surface water , ground water and the air"...

It should also be noted that pollution control is also the responsibility of other statutory bodies including NRW and the Health and Safety Executive and the Council regularly consults with these bodies as part of the planning application process. Accordingly it is the Council's view that site allocation objections on matters relating to the potential effects of pollution generated can be addressed through the LDP policy framework and the planning application process.

3.1.3 Impact on existing facilities and services

Representations objecting to the proposed housing developments raised concern over the additional demand that proposed housing developments would have on existing services and facilities, such as schools and medical facilities (doctors and dentists being cited). Similar representations were made with regard to the

provision of services to accommodate the needs of additional populations within the settlements where housing is proposed.

Council Response

Alongside the production of the LDP, the Council has produced a draft Infrastructure Plan and is supported by a series of background papers. This identifies the necessary infrastructure requirements to support the level housing growth within the LDP and considers the infrastructure requirements for each housing allocation for the following infrastructure types where the LDP can seek contributions towards new or enhanced provision where required:

- Transport – including walking and cycling, public transport, park and ride facilities and highway infrastructure
- Education
- Community Facilities – including libraries, community buildings and leisure facilities
- Open Space and ecological improvements
- Affordable Housing

For these areas, the draft Infrastructure Plan identifies the planning obligation requirements for each housing allocation which would be sought by the Council when considering future planning applications. Appendix 1 of the draft Infrastructure Plan sets out the likely site specific infrastructure requirements for a range of facilities according to the scale of the proposed development and existing levels of provision in the vicinity of the development. This includes consideration of a range of local facilities and infrastructure types such as transportation (including walking and cycling, public transport, other sustainable transport and highway infrastructure), education facilities, community facilities (including libraries, community buildings and leisure facilities) and open spaces (equipped play areas and outdoor sports provision).

Appendix 2 of the draft Infrastructure Plan sets out the overall authority wide and strategic infrastructure requirements. For each infrastructure type the draft Plan identifies the potential funding sources which include planning obligation requirements from each housing allocation that would be sought by the Council in the consideration of any future planning application.

The provision of health and medical facilities is overseen by the Cardiff and Vale NHS Health Board. Whilst not a direct responsibility of the Council the draft Infrastructure Plan considers provision of health and medical facilities and the LDP allocates land for the expansion of Llandough Hospital (Policy MG8 Provision of Health Facilities) and supports developments which provide for new and enhanced health facilities under the policy. Furthermore, the Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities may be required over the LDP period. It is anticipated that any future investment in health provision would be overseen by the NHS Health Board and funded by Welsh Government Health Department grants.

It is therefore considered that in preparing the Deposit LDP, the Council has considered the necessary infrastructure to support the future development needs of the area as set out within the LDP. This is reflected in the policy requirements Policy MD4 (Community Infrastructure and Planning Obligations) alongside the Plan's other development management policies which make specific reference to the provision of services and facilities to meet the demands generated by the development.

3.1.4 Flood Risk and Water Infrastructure Capacity

The issue of increased flood risk was raised in relation to a number of site allocations. Representors referred to recent local flooding incidents and the potential risk of flood as a result of future green field development.

Objections were also made to housing allocations referring to existing condition and performance of local sewer networks and water infrastructure and which considered there to be no capacity to accommodate future development.

Council Response

In relation to matters associated with flooding and potential flood risk, as part of the LDP site assessment process the Council ensured that the site selection process took a precautionary approach as set out in Technical Advice Note (TAN) 15 Development and Flood Risk. This Council's site assessment process sought to avoid any sites which are located in a high flood risk area or areas where flooding consequence where unlikely to be overcome.

Details of the Council's consideration of flood risk are set out in the Council's Plan Preparation and the Assessment of Flood Risk Background Paper (2013). In allocating sites within the LDP, the Council has sought to avoid development on sites in areas at high risk of flooding, and some potential development sites have been rejected on that basis. In this respect, a precautionary approach to development allocations has been adopted, with the Council having largely exclude all candidate or other sites affected by flood risk. The exception to this are those sites which have planning consent and where NRW has indicated that a Flood Consequence Assessment (FCA) has been undertaken to its satisfaction. For those small number of sites that have been identified as incorporating areas of C2 flood risk, these again have only been included where the Council has been satisfied through its consultation with Natural Resource Wales and Dwr Cymru Welsh Water that built development could be either sited outside of such zones, and/or the impacts of flooding would be able to be acceptably managed.

In preparing the Deposit LDP the Council consulted with Dwr Cymru Welsh Water (DCWW) on the necessary infrastructure requirements to support the levels of development proposed within the LDP. The Information provided by DCWW pertaining to the site specific infrastructure requirements of each housing allocation is contained in Appendices 5 of the Deposit LDP.

Further formal representations submitted by DCWW on the Deposit LDP (ID 2312/DP1), did not raise any concerns regarding the delivery of sewer and water infrastructure to serve the housing allocations, and advised the Council that DCWW *"will monitor the scale and pace of development in this area over the plan period in order to ensure that we can adequately plan to accommodate this site should it be required to meet a potential shortfall"*.

Policy MD 8 Environmental Protection requires all new development to demonstrate that the will not unacceptably impact on the pollution of land, surface water ground water, or flood risk and the consequences of flooding. This Policy reflects advice in Welsh Government Planning Guidance TAN15 Flood Risk and is supported by NRW and DCWW.

Additionally, the Deposit LDP requires all development proposals to satisfactorily meet all assessed infrastructure requirements, including highways and drainage capacity improvements, both on and off-site, and mitigating any impacts on the natural environment. These obligations are included in the conditional criteria attached to the site development policies. All planning applications on land that has been identified to

be at risk of flooding will be required to follow the approach set out in TAN 15 and the new policy and developments proposals will need to be accompanied by a Flood Risk Assessment

The Council is therefore of the view that in preparing the LDP it has given full and appropriate consideration to the potential impact of new development on flooding risk and the requirements for additional water resource infrastructure to support the housing allocations within the LDP. Additionally, there is no overriding evidence submitted on the Deposit LDP that indicates that such provision cannot be provided either by developers of housing allocations or by DCWW as part of their long term programme of infrastructure investments.

Consequently, the Council is of the opinion that representations raising concerns relating to increased flood risk and lack of associated water infrastructure have been fully addressed in the preparation of the LDP, and further protection is provided through the policy framework of the LDP.

3.1.5 Loss of greenfield land

Objections have been raised on the loss of agricultural land as a result of the LDP housing allocations, including objections by the Welsh Government. In objecting to Greenfield housing allocations development objectors state that the Council should give priority to brownfield site developments, with reference being made to a new settlement at Llandow.

The Welsh Government (ID 4679/1/42) also raised concerns over the amount of Greenfield land allocated in the Plan, whilst acknowledging development of Greenfield land will be required to meet the housing requirement, the selection of sites should be fully justified.

Council response

Through the candidate sites submissions stage, the Council received some 420 sites for consideration, the majority of which were located in rural locations and on Greenfield land, which is to be expected given the predominantly rural character of the Vale of Glamorgan. A number of these sites also adjoined the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the grounds that it would be contrary to the overarching LDP Strategy. Further details on this are set out in the Council's Revised Options Appraisal Background Paper (2009).

Furthermore, in considering the proposed development of land at Llandow Airfield, the Council commissioned a review of the agricultural land quality of the undeveloped areas of which the proposed new settlement would occupy, this revealed that a significant area of the land (51 ha) falls within grade 3a agricultural land classification (best and most versatile classification), and a further 36 ha of 3b agricultural land. In this regard Planning Policy Wales states that:

"In the case of agricultural land, land of grades 1, 2 and 3a of the Department for Environment, Food and Rural Affairs (DEFRA) Agricultural Land Classification system (ALC) is the best and most versatile, and should be conserved as a finite resource for the future. In development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade."

Consequently, identifying land to meet the identified housing requirement, priority has been given to the identification of suitable and developable sites within existing settlements including brownfield development sites. In this regard the Policy MG2 – Housing Allocations, allocates 18 brownfield sites for housing capable of accommodating 3,030 dwellings, 39% of the total housing allocation. However, as the availability of brownfield sites is insufficient to meet the assessed housing requirement for the Vale of Glamorgan, it has therefore been necessary to accommodate housing growth through the expansion of existing settlements on to Greenfield land.

Notwithstanding this, when selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has consulted with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites. From this work the Council has been able to determine that the majority of land allocated within the LDP is categorised as Grade 3b or lower. The Council has also sought to exclude areas of 3a grade land (Best and Most Versatile (BMV)), from site allocations such as that site associated with site MG2 (46), reducing the area of the candidate site submission. Additionally, in limiting the loss of BMV land, Appendix 5 of the LDP identifies those sites where agricultural land has been indicated by the Welsh Government, but where a further detailed agricultural land assessment is required to verify the grading of the land.

Consequently, in identifying the housing allocations listed in LDP Policy MG2, the Council has sought to ensure that priority is given to brownfield developments, and where greenfield sites have been required these have generally been limited to those of lower quality, that is Grade 3b and below, consistent with guidance contained in Planning Policy Wales. The Council has prepared a Best and Most Versatile Agricultural Land Statement which sets out the proportion of site allocations within the BMV category or below and is based upon the latest information received on sites where planning applications have been received. Whilst the loss of a small proportion of BMV land may result from the LDP site allocations, this is considered to be insignificant and in any case justified given the nature of available sites in the Vale of Glamorgan and the local housing needs identified across the authority area.

3.1.6 Negative impact on nature conservation and loss of protected species

In objecting to the proposed housing allocations, representations cited the loss of Greenfield land and the impact that this would have on wildlife and nature conservation.

Council Response

In preparing the LDP all sites submitted for consideration have been subject to the Council's Site Assessment Appraisal. This process included the identification of sites in or within close proximity to areas of local, national and international nature importance. Consultation was also undertaken with Natural Resources Wales (formerly the Countryside Council for Wales) who provided advice on sites, alongside closely working with the Council's biodiversity officer to ensure the integration of the Council's SINC study within the LDP process. This process allowed the Council to omit sites from the LDP where this was considered to have an unacceptable impact on nature conservation, and to identify where necessary mitigation or more detailed ecological assessments would be required to be undertaken as part of any future development proposals, and these are referred to in Appendix 5 of the Deposit LDP.

Additionally, as a statutory consultee NRW have formally responded to the Deposit LDP, providing additional representations on site specific matters as well as the policy framework of the LDP. Through their representations, NRW have provided further clarification on site requirements, but have not raised significant objections to the majority of housing allocations in respect of potential negative impacts on nature

conservation interests. This is with the exception with an objection received to site MG 2 (5) due to the presence of rare arable weeds, which is considered in more in the site specific responses below.

3.1.7 Impact on the character of the existing settlements

Objections to the LDP have been raised by representors in respect of the impact that new development will have on the existing character of the settlement where new housing allocations are proposed. These objections include the impact on Special Landscape Area designations, conservation areas and the setting of listed buildings as well as a general objection to the expansion of housing developments on Greenfield sites previously identified as being outside of the residential settlement boundary of the previous Vale of Glamorgan Unitary Development Plan.

Council Response

In considering the suitability of housing allocations within the Deposit LDP the Council assessed the impact of developments on nature conservation, landscape quality and any historic assets within close proximity to the site. The elements considered are set out in the Council's Site Assessment Background Paper.

For sites allocated within the Plan where the development of the site was in close proximity to conservation areas or within designated landscape areas, Appendix 5 of the Deposit LDP identifies where this is the case and the Plan requires proposals to ensure that there is no unacceptable effect on these designations. The LDP sets out a range of policies relating to the protection of the built and natural environment, recognising that development proposals need to ensure that the character of the Vale of Glamorgan's natural and built heritage is safeguarded and that new development proposals positively contribute to local character.

In this regard, the impact of any development upon heritage assets will be carefully assessed at the planning application stage taking into account the requirements of LDP Policy MD9 (Historic Environment), alongside other LDP policies relating to design, site context and local character. The development of site allocations in the LDP would not be supported where the impacts of development upon heritage assets is not sufficiently addressed through good design and/or appropriate mitigation. Where site allocations have been made in close proximity to designated heritage assets, this has been also been indicated within Appendix 5.

With regards to representations objecting to housing allocations on the grounds that the allocation is outside the existing settlement boundary, the Council has sought to ensure that housing allocations are located within close proximity of existing settlements to safeguard against sporadic development within the countryside. To assist in this the Council used the previous UDP settlement boundaries within the Site Appraisal Methodology to determine the suitability of sites, excluding those which were located away or significantly detached from settlements.

In relation to settlement, special landscape area and green wedge boundaries, these were originally defined by the Council for the purpose of managing development during the lifetime of the UDP to 2011. The permanence of these designations are limited to the lifetime of a statutory plan and will therefore always be subject to periodical reviews and potential change in order to take account of future development needs and the need to manage future development. Additionally, the boundaries of special landscape areas and green wedges are drawn to follow logical and defensible boundaries, following either existing physical boundaries or around site allocations. For the LDP plan period these boundaries have been reviewed and redrawn to follow new allocations.

3.1.8 Disproportionate distribution of housing

A number of residential site allocation representations objected towards the disproportionate increase in the size of existing settlements as a result of the proposed housing developments. This related to individual settlements as well as to the level of housing identified for Minor Rural Settlements.

Council Response

The LDP identifies a Settlement Hierarchy of towns and villages which have a particular role and function and these are considered to be sustainable locations where an element of future development can take place. This has been informed by a Sustainable Settlement Appraisal (2013) which considers the role, function and range and choice of services and facilities. In identifying site allocations the Council has also considered the LDP Strategy and Site Assessment process alongside other key elements of the LDP evidence base such as the Local Housing Market Assessment.

Within the Minor Rural Settlement category there is a broad spectrum of settlements, in terms of size and resident population. Consequently, site allocations for specific settlements need to be considered on their own merits having regard to all other factors. Comparisons between the numbers of houses proposed within one settlement to that in another do not take into consideration the physical capacity of each village in the hierarchy to accommodate additional housing such as the settlements physical, environmental and infrastructure characteristics as well as individual site constraints.

This is also reflected in the level of growth apportioned to each settlement category in the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). The Council considers that the distribution of housing in the Deposit LDP is appropriate given the housing need across the Vale of Glamorgan and that this is consistent with LDP Strategy to focus development within the South Eastern area of the Vale of Glamorgan, the St Athan area and development in other sustainable settlements.

3.1.9 Challenges to the Council's Sustainable Settlements Appraisal and Settlement Hierarchy

Objections to residential site allocations challenged the Council's assumptions for the categorising settlements according to the findings of the Council's Sustainable Settlements Appraisal. The main areas of objection relate to the scoring of individual settlements in respect of the level of services and facilities available and how this is reflected in the ranking of settlements within the hierarchy which has considered to have been used as the basis for identifying site allocations.

Council Response

The LDP Settlement Hierarchy ranks the towns and villages within the Vale of Glamorgan to reflect the broad level of services and facilities each settlement offers. The categories of settlements also generally reflect their individual role and function based on their links and geographical areas they serve. In this respect, Planning Policy Wales (Section 4.7) states that development plans need to provide a framework to stimulate, guide and manage change towards sustainability. They 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. They should also assess the contribution settlement strategies can minimise the need to travel. Development plans should consider not only the needs of existing urban and rural areas but also future relationships between urban settlements and their rural hinterlands.

The LDP Settlement Hierarchy has therefore been informed by an audit of services and facilities as part of an assessment of settlements to ensure they accord with the sustainable location principles contained within national planning policy. The aim of establishing a settlement hierarchy is to promote sustainable communities where future development can be managed and located close to services and facilities with access to good public transport links. By locating housing, jobs and services close together, the need for travel will be reduced and the ongoing prosperity of existing settlements will be supported.

Whilst there is no specific national planning guidance on how a settlement hierarchy should be defined or developed, Chapter 4 of Planning Policy Wales outlines the principles Local Planning Authorities should consider in their land allocation policies and proposals. These include the need to consider proposals to:

- Promote sustainable patterns of development, identifying previously developed land and buildings, and indicating locations for higher density development at hubs and interchanges and close to route corridors where accessibility on foot and by bicycle and public transport is good;
- Maintain and improve the vitality, attractiveness and viability of town, district, local and village centres;
- Foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings;
- Locate development so that it can be well serviced by existing infrastructure;
- Ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location; and
- Ensure that tackling the causes and consequences of climate change is taken into account in locating new development.

PPW also advises that local authorities should assess the extent to which their development plan settlement strategies and new developments are consistent with minimising the need to travel and increasing accessibility by sustainable modes. A broad balance between housing and employment opportunities should be promoted to minimise significant commuting distances. Local authorities should also adopt policies to locate major generators of travel demand such as housing, employment, retailing, and community facilities within existing urban areas or other locations which are, or can be, well served by public transport, or can be reached by walking or cycling is also (paragraph 4.7.4 refers).

The Vale of Glamorgan Adopted Unitary Development Plan (UDP), policy HOUS2 identified a hierarchy of urban and rural settlements where additional small scale windfall housing development was considered acceptable. The settlements identified within the UDP hierarchy were considered “to have sufficient physical form and capacity to assimilate further infill development without it having a detrimental impact on their existing character and environment” (paragraph 4.4.63).

For the LDP Settlement Hierarchy, the Council undertook a Sustainable Settlements Appraisal (SSA) of all settlements within the Vale of Glamorgan using a broad range of sustainability measures developed by the Council, in order to reflect the general principles set out in national planning policy and to assess settlements across the area including the rural Vale of Glamorgan. Using these measures, the review involved an audit of services and facilities within each settlement, and a system of scoring provided initial rankings for each settlement according to the level of services available within each against identified sustainability measures. Secondary data was also considered to further expand the analysis together with consideration of other relevant socio-economic considerations such as the population of each settlement and the location, role and function of settlements within the wider urban, coastal and rural areas of the Vale of Glamorgan. Further details on the methodology and findings are set out in the Council's Sustainable Settlements Appraisal Background Paper (2013).

Whilst the Sustainable Settlements Appraisal considered potential groupings of settlements, other factors were also considered for the purposes of site allocations and to inform the LDP Settlement Hierarchy. This included consideration of known environmental constraints and planning designations assessed as part of the wider evidence base prepared for the LDP and individual candidate site assessments. Further information on the site assessments can be found in the Findings of the Site Assessment Process (2013) background paper.

Through the Council's review of settlements, the list of settlements originally identified in the UDP has been refined to exclude the rural villages of Broughton, Llanblethery, Trerhyngyll previously identified. The review has also refined the grouping of urban and rural settlements previously identified into 4 categories of settlements. These categories reflect the size, relative provision of services, accessibility of services, together with the role and function of each settlement within the Vale of Glamorgan, shown in the following hierarchy:

LDP SETTLEMENT HIERARCHY

- **KEY SETTLEMENT:** BARRY
- **SERVICE CENTRE SETTLEMENTS:** COWBRIDGE, LLANTWIT MAJOR, PENARTH
- **PRIMARY SETTLEMENTS:** DINAS POWYS, LLANDOUGH (PENARTH), RHOOSE, ST. ATHAN, SULLY, & WENVOE
- **MINOR RURAL SETTLEMENTS:** ABERTHIN, BONVILSTON, COLWINSTON, CORNTOWN, CULVERHOUSE CROSS, EAST ABERTHAW, EWENNY, FFERM GOCH, GRAIG PENLLYN, LLANCARFAN, LLANDOW, LLANMAES, OGMORE BY SEA, PENDOYLAN, PENLLYN, PETERSTON SUPER ELY, SIGINSTONE, SOUTHERNDOWN, ST BRIDES MAJOR, ST NICHOLAS, TREOES, WICK, YSTRADOWEN.

The top tiers of the LDP Settlement Hierarchy consist of the key settlement of Barry, the Service Centres and Primary Settlements and these are well established settlements with the largest population and range of services and facilities and are areas considered capable of accommodating future development. The LDP Settlement Hierarchy cascades down to include smaller rural villages which provide sufficient access to services and facilities to accommodate additional growth to sustain rural communities by meet local housing needs and providing opportunities for local employment. These settlements are considered to play an important role in the sustainable rural communities of the Vale of Glamorgan.

In recognition of this, a range of policies within the LDP, namely Policy MD1 (Location of Development), MD5 (Development in Key, Service Centre and Primary Settlements) and Policy MD6 (Development within Minor Rural Settlements) are complimentary to, and supportive of, the settlement hierarchy in relation to the character of individual settlements and level of services and facilities available. These policies require new development to be directed to the most sustainable locations in terms of accessibility and services and utilities provision, and include criteria promoting sustainable modes of transport; ensuring adequate community infrastructure exists or can be provided to meet the needs of future residents, and for development to respect the character of the settlement.

In developing the spatial strategy and settlement hierarchy the Council has sought to contribute to the achievement of sustainable development. The majority of growth is directed to the main urban settlements in line with national policy and economic and environmental sustainability objectives. However, the Council considers that the social element of sustainability – supporting cohesive and vibrant local communities, providing housing to meet identified needs and maintaining accessible local services – constitutes an integral component and has particular resonance for rural communities in the Vale of Glamorgan. Therefore the

Council maintains that the Strategy and settlement hierarchy should also enable a minor proportion of overall housing growth to be directed towards the smaller rural settlements to support social sustainability objectives.

This approach is reflected in the level of growth apportioned to each settlement category in the hierarchy as identified in the Housing Land Supply Background Paper (2013). Within the Minor Rural Settlement category there is a broad spectrum of settlements, in terms of size, population and capacity. Consequently, the Council is of the view that representations which object to the disproportionate level of housing within a specific settlement, and those which compare the number of houses proposed within one settlement to that in another have not taken into consideration the physical capacity of each village within the hierarchy to accommodate additional housing as well as their wider environmental and infrastructure characteristics, location and role.

The Council therefore considers that the proposed settlement hierarchy is sound, based on a transparent and robust methodology with levels of growth and site allocations supported by a wide range of supporting evidence. The Council maintains that the tiers of settlements identified accurately reflect their role, function and overall level of sustainability. Therefore the Council maintains that spatial strategy and settlement hierarchy for the Vale as a predominantly rural authority should enable minor proportion of overall housing growth to be accommodated within the smaller rural settlements in line with the LDP Strategy to meet the identified needs and to support social sustainability objectives.

3.1.10 No justification for housing growth within settlements

Objections to housing allocations have cited the lack of evidence to support the need for the level of housing proposed within the settlement. In making these objections, representations make reference to the Council's Rural Affordable Housing Needs Assessment, which suggests a low need for affordable housing within rural settlements.

Council Response

The Council has allocated sufficient sites to meet its assessed housing needs. The housing provision of the Plan has been assessed using a robust evidence base which takes account of the latest Welsh Government's household projection figures, as a starting point for the consideration of the residential requirement, together with all other material factors in accordance with Section 9.2 of Planning Policy Wales. Further information on this can be found within the Housing Provision background paper (2015). The identified housing requirement is for the Vale of Glamorgan as a whole, and the Council has sought to meet this housing requirement through the provision of deliverable site allocations within and adjoining existing settlements in accordance with the LDP Strategy and the Plan's Settlement Hierarchy.

The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan and identifies an overall affordable housing need of 915 affordable dwellings across the Vale of Glamorgan over the period 2010 to 2015. Within the rural housing market sub area there is an affordable housing requirement of 35 dwellings per annum. The LHMA is supplemented by the Rural Housing Needs Assessment (RHNA), which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 2015.

Additionally, Appendix A5 (Improving market balance over the longer term) of the RHNA seeks to identify the overall anticipated housing requirements across all tenures (market and affordable housing) between 2010-2030. This projected a requirement within the rural Vale for some 3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Accordingly, the Council considers that in meeting the identified housing requirement for the Vale of Glamorgan, the distribution of housing within the Deposit LDP will assist in meeting the future housing needs of both urban and rural areas, thereby ensuring their long term viability and sustainability.

4. Policy MG2 Site Specific Representations

The following section provides a summary of the site specific objections submitted on individual housing allocations listed in Policy MG2. It should be noted that some sites allocated within the LDP were subject of a valid planning application, and some sites have been granted permission since the Council placed the LDP on Deposit. For completeness, the Council has summarised the issues raised on these sites.

1. Full details of representations submitted on the Deposit Local Development Plan are available in the Deposit LDP Representations Register (2014).

Site MG2-1 Phase 2, Barry Waterfront		
Site Representer ID		
ID-6062/1/1, ID-6203/1/2		
<i>Summary of the Grounds of Objections</i>		
<ul style="list-style-type: none"> • There are no proposals to develop water sport facilities within the Barry Waterfront Development (Representation ID-6062/1/1) • Future redevelopment within Barry Waterfront must ensure that it would not conflict with the continued operation of the wider commercial activities • Extra housing will put pressure on local services including schools and medical services • Increased traffic congestion on the A4055 and the junctions at Cross Common Road and Murch Road 		
<i>Council Response</i>		
<ul style="list-style-type: none"> • There are no proposals to develop water sport facilities within the Barry Waterfront • Ensure that redevelopment would not conflict with the continued operation of the wider commercial activities <p>The proposed development at Barry Waterfront was originally identified in the Vale of Glamorgan Unitary Development Plan and the current LDP allocation relates to the second phase on regeneration of this important brownfield site. The approved Masterplan for Barry Waterfront sets out the Council's aspiration to develop the Waterfront into a vibrant mixed use development- including the provision of water based leisure and recreation activities. Whilst the waterside is under the control of Associated British Ports, the Council will continue to support development of the waterside at Barry Waterfront whilst safeguarding the operational requirements of the port.</p> <ul style="list-style-type: none"> • Extra housing will put pressure on local services including schools and medical services <p>A general response to this issue is contained in paragraph 3.1.3. With regard to Barry Waterfront itself, the LDP seeks to encourage a mixed use development incorporating a range of services and facilities that would serve the development and the wider area. In this regard, to date the development has included a new doctor's surgery and chemist, business support and training facilities and retail and hotel developments. The LDP also identifies the provision for a new primary school and further retail and community provisions.</p> <p>It is therefore the opinion of the Council that in preparing the Deposit LDP, it has fully considered the necessary infrastructure to support the proposed housing growth identified within the LDP, and reflected in the</p>		

policy requirements of the LDP as detailed in Policy MD4 Community Infrastructure and Planning Obligations alongside other LDP policies which make specific reference to the provision of services and facilities to meet the demands generated by the development.

- **Increased traffic congestion on the A4055 and the junctions at Cross Common Road and Murch Road**

A general response to this issue is contained at 3.1.1. The Council is of the opinion that in preparing the LDP the Council has sought to ensure that it has appropriate level of understanding regarding the potential increase in demand for road space generated by the proposed housing growth of the LDP including traffic congestion on the A4055 and junction at Cross Common Road and Murch Road. The Highway Impact Assessment provides sufficient detail on the likely traffic impact of development to that the Council can require developers to provide the necessary transport improvements to accommodate the future planned housing growth in the Vale of Glamorgan.

Consequently, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed and shall seek to ensure that future development mitigates the anticipated increase in traffic, therefore addressing the concerns raised through the LDP consultation.

Site MG2-2 Land at Higher End, St. Athan

Representors ID and Name

ID-125/1/7	ID-5282/1/1	ID-5609/1/1
ID-1310/1/1	ID-5285/1/1	ID-5630/1/1
ID-1814/4/1	ID-5454/1/1	ID-5698/1/1
ID-2036/4/1	ID-5536/1/1	ID-5754/1/1
ID-2216/1/1	ID-5540/1/1	ID-5777/1/1
ID-2267/4/1	ID-5545/1/1	ID-5815/3/2
ID-2267/6/2	ID-5549/1/1	ID-5830/1/1
ID-2267/7/1	ID-5550/1/1	ID-5905/1/1
ID-2267/7/2	ID-5555/1/1	ID-5968/1/1
ID-4673/1/12	ID-5595/1/1	ID-5969/1/1
ID-4910/1/1		

Summary of the Grounds of Objection

- Loss of greenfield agricultural class 3a land
- Loss of biodiversity and ecology
- Public services are presently at capacity including schools, GPs, shops, dentists
- Public services are presently at capacity including schools, sport facilities, play areas, allotments, GPs, and dentists
- Concerns of appropriateness of the proposed highway and pedestrian access
- Poor public transport provision
- Questions on the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone
- No viable business plan to support the need for the Aerospace Business Park
- Loss of visual amenity to residents adjacent to the allocated site
- Potential risk of flooding
- Loss of green belt between existing residential dwellings and the MoD site
- Issues with sewerage and drainage capacity
- Site will be subject to significant noise from MoD St Athan and Welsh Government Aerospace

Business Park

- Potential de-valuation of property

Council Response

Part of the site is subject to outline planning permission (2009/01368/OUT) for 100 dwellings.

- **Loss of greenfield agricultural class 3a land**

A general response to this issue is contained in paragraph 3.1.5.

An agricultural land quality survey has been undertaken for the site in support of the approved planning permission granted for part of the site. This states that

"The entire site has been identified as comprising of moderate (sub-Grade 3b) quality, i.e. it is not "best and most versatile agricultural land" as defined in Planning Policy Wales. Accordingly, it is considered that the proposed development would not adversely impact upon the best or most versatile agricultural land and would, therefore, be in accordance with Planning Policy Wales. In addition, no comments have been received regarding this site from the Welsh Government's Natural Environment and Agriculture Department.

- **Loss of biodiversity and ecology**

A general response to this issue is contained in paragraph 3.1.6. NRW have submitted the following recommendation in relation to this site:

"We are aware of records of Great Crested Newts, bats and dormice being present in the vicinity of these allocations. Proposals for development at these sites will therefore need to ensure there is no likely detriment to the maintenance of the Favourable Conservation Status of these protected species, and comply with the Conservation of Habitats and Species Regulations 2010 (as amended)."

A Great Crested Newt Mitigation Strategy report was undertaken in support of the approved planning permission on part of the site, and identified specific mitigation measures to safeguard Great Crested Newts. NRW were consulted on the strategy and did not object to the outline planning application, subject to compliance with the great crested newt mitigation strategy and the preparation and implementation of a habitat management plan. Consequently it is considered that this site can be developed without having an unacceptable adverse impact on biodiversity and ecological interests.

- **Public services are presently at capacity including schools, sport facilities, play areas, allotments, GPs, and dentists**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p44) of the Infrastructure Plan sets out the planning requirements for the site MG2-2 including contributions for improved sustainable transport, additional schools places, a new on-site play area, enhanced community facilities in the St Athan ward, enhancement to St Athan library and built sports facilities.

In preparing the Deposit LDP, the Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities (such as new GP surgeries) would likely be required over the LDP period. This did not identify the St Athan area however it is anticipated that any required future investment in health provision would be funded by Welsh Government Health Department grants.

- **Concerns of appropriateness of the proposed highway and pedestrian access**

A general response to this issue is contained in paragraph 3.1.1. In granting planning permission on part of the allocated site the Council has considered this matter. It is considered highway access for development of the remaining site can be provided for all users. Appendix 5 of the Deposit LDP identifies that any proposal on this site would require a robust Transport Assessment which evaluates and determines mitigation measures which alleviate any detrimental impact on the local highway network and associated road junctions.

- **Poor public transport provision**

In granting planning permission on part of the allocated site the Council secured planning contributions towards sustainable transport. The Council shall also ensure further contributions to sustainable transport are made when considering subsequent planning proposals on the remainder of the housing allocation in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations.

- **Questions on level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone**

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the hierarchy. This approach is reflected in the level of growth apportioned to each settlement category within the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). For St Athan Strategic Opportunity Area, the Deposit LDP proposes the development of some 1300 dwellings on 6 sites reflecting its strategic importance in relation to the St Athan - Cardiff Airport Enterprise Zone.

The housing allocations within the Deposit LDP have been made to reflect the strategic importance of the St Athan – Cardiff Airport Enterprise Zone, and the opportunity for local residents to access employment opportunities generated by the Enterprise Zone. They have been made to locate residential development close to future job creation and to take advantage of the local employment opportunities that the Enterprise Zone will offer. Whilst it is acknowledged there is no certainty that local residents will be employed at the St Athan Enterprise Zone it is considered appropriate and prudent to provide the opportunity for future employees to live in the local area.

- **No viable business plan to support the need for the Aerospace Business Park**

The St Athan and Cardiff Airport Enterprise Zone board is in the process of preparing a Strategic Development Framework for the Welsh Government which will inform future detailed proposals for the Enterprise Zone. Further detail will also be contained within any future master plans for the strategic sites which will undergo public consultation. Residential allocations are proposed in the St Athan area in order to reflect the strategic importance of the St Athan Strategic Opportunity Area identified under Policy SP2 (Strategic Sites). This site is considered to form part of those allocations which support the development needs of the Strategic Site at St Athan and provide the opportunity for future employees to live in the area. Notwithstanding this, this residential allocation is considered to form a logical extension to St Athan Village which also contributes towards meeting local housing need.

- **Loss of visual amenity to residents adjacent to the allocated site**

The loss of views for existing residents is not a planning consideration.

- **Potential risk of flooding**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council

consulted with Natural Resources Wales (NRW) to identify potential issues associated with flooding and the risk of flooding. The site is not located in an identified flood zone in the Development Advice Maps (DAMs) and NRW have not raised any objection to the proposal. Additionally, NRW were also consulted on the approved planning application for part of the proposed site and raised no objections subject to the use of appropriate conditions relating to surface water disposal, pollution prevention and biodiversity.

- **Loss of green belt between existing residential dwellings and the MoD site.**

The site is not designated as a green belt.

- **Issues with sewerage and drainage capacity**

In preparing the Deposit LDP the Council consulted with Dwr Cymru Welsh Water (DCWW) on the necessary infrastructure requirements to support the levels of development proposed within the LDP. In respect of allocation MG2 (2) DCWW have not raised any objection to the proposals but have submitted the following site specific commentary:

"The proposed development is in an area where there are water supply problems for which there are no improvements planned within our current Capital Investment Programme AMP5 (years 2010 to 2015). In order to establish what would be required to serve the site with an adequate water supply, it will be necessary for the developer to fund the undertaking of a hydraulic modelling assessment on the water supply network.

Our local sewer network is too small to accommodate the foul flows from this development. A hydraulic modelling assessment will be required to establish the point of connection to the public sewer system and / or any improvement work required. In terms of our Waste Water Treatment Works, your Authority are advised that the total density proposed for allocations in St. Athan will exceed the theoretical design of our West Aberthaw Outfall WwTW. Dependent on the pace and scale of development, there will ultimately be a time when increased capacity will be required, which will form part of our Asset Management Plan investment."

In light of the comments provided by DCWW, the Council considers that necessary infrastructure can be provided to serve the future development of this site.

- **Site will be subject to significant noise from MoD St Athan and WAG aerospace Business Park**

A noise impact assessment has been undertaken in support of the planning consent already granted for part of the site. This concluded that the proposed development would not experience an unacceptable level of noise from existing site activities. Development of the remaining site would require a further noise assessment covering the whole allocation. This assessment would consider the issue affecting the development of the remaining site.

- **Potential de-valuation of property (ID:5754/1/1)**

The potential effect of development on property prices is not a material consideration that can be addressed through the planning system.

Site MG2-3 Land at Church Farm, St. Athan		
Representor ID and Name		
ID-125/1/8 ID-1814/7/1 ID-2036/4/2	ID-2267/8/1 ID-4673/1/13	ID-4910/1/2 ID-5777/1/2
<p>Summary of the Grounds of Objection</p> <ul style="list-style-type: none"> • Loss of greenfield land • Loss of biodiversity and ecology • Proposal is prone to flooding/ drainage issues • Questions on the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone • No viable business plan to support the need for the Aerospace Business Park • Questions whether sites allocated for both employment and housing will be deliverable as there is uncertainty over whether the required employment used to justify the housing allocations at St Athan will be delivered • Lack of local services and facilities to support additional development • Loss of visual amenity to residents adjacent to the allocated site • Development is outside the existing settlement boundary • Poor public transport provision • Already an availability of brownfield land to develop on for housing • Council should support existing employment areas instead of allocating new ones • Insufficient highway capacity to cope with additional traffic 		
<p>Council Response</p> <ul style="list-style-type: none"> • Loss of greenfield land <p>A general response to this issue is contained in paragraph 3.1.5. In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has worked closely with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites. With regard to site MG2 (3) the Welsh Government has indicated that:</p> <p>'Site is shown on the provisional ALC map as ALC Grade 2. There has previously been a pre-revision survey grading the site as Urban to the north (small area), the rest of the site as 2, 008-79 (1979). There are no post 1988 ALC surveys for this site. However, a large area of land was surveyed to the north in 2009 (St Athan Defence Technical College) which showed the large majority of land mapped as ALC Subgrade 3b, due to soil limitations. As this site lies on the same soil type, it is unlikely BMV land will be present if surveyed according to the MAFF 1988 ALC guidelines. A site specific survey would be required for definite grading'</p> <p>Accordingly, it is considered that the proposed development would not adversely impact upon the best or most versatile agricultural land and would, therefore, be in accordance with National Planning Policy Wales.</p> <ul style="list-style-type: none"> • Loss of biodiversity and ecology <p>A general response to this issue is contained in paragraph 3.1.6. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding alongside potential impacts on ecology. In respect of allocation MG2 (3) NRW have not raised any objection to the proposal but have advised that:</p> <p>We are aware of records of Great Crested Newts, bats and dormice being present in the vicinity of these</p>		

allocations. Proposals for development at these sites will therefore need to ensure there is no likely detriment to the maintenance of the Favourable Conservation Status of these protected species, and comply with the Conservation of Habitats and Species Regulations 2010 (as amended).

- **Proposal is prone to flooding/ drainage issues**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (3) NRW have not raised any objection to the proposal.

- **Questions on the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone**

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the hierarchy. This approach is reflected in the level of growth apportioned to each settlement category within the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). For St Athan Strategic Opportunity Area, the Deposit LDP proposes the development of some 1300 dwellings on 6 sites reflecting its strategic importance in relation to the St Athan - Cardiff Airport Enterprise Zone.

The housing allocations within the Deposit LDP have been made to reflect the strategic importance of the St Athan – Cardiff Airport Enterprise Zone, and the opportunity for local residents to access employment opportunities generated by the Enterprise Zone. They have been made to locate residential development close to future job creation and to take advantage of the local employment opportunities that the Enterprise Zone will offer. Whilst it is acknowledged there is no certainty that local residents will be employed at the St Athan Enterprise Zone it is considered appropriate and prudent to provide the opportunity for future employees to live in the local area.

- **No viable business plan to support the need for the Aerospace Business Park**
- **Questions whether sites allocated for both employment and housing will be deliverable as there is uncertainty over whether the employment proposals used to justify the housing allocations at St Athan will be delivered**

The Welsh Government is in the process of preparing a development framework for the future development of the Enterprise Zone which will provide further details on the proposals set out in the LDP. Residential allocations are proposed in the St Athan area in order to reflect the strategic importance of the St Athan Strategic Opportunity Area identified under Policy SP2 (Strategic Sites). This site is considered to form part of those allocations which support the development needs of the Strategic Site at St Athan and provide the opportunity for future employees to live in the area. Notwithstanding this, this residential allocation is considered to form a logical extension to St Athan Village which also contributes towards meeting local housing need.

- **Lack of local services and facilities to support additional development**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p45) of the Infrastructure Plan sets out the planning requirements for the site MG2 (3) including contributions for improved sustainable transport, additional schools places, a new on-site play area, enhanced community facilities in the St Athan ward, enhancement to St Athan library and built sports facilities.

In preparing the Deposit LDP, the Council has worked with the Cardiff and Vale University Health Board to

identify areas where additional medical facilities (such as new GP surgeries) would likely be required over the LDP period. This did not identify the St Athan area however it is anticipated that any required future investment in health provision would be funded by Welsh Government Health Department grants.

- **Loss of visual amenity to residents adjacent to the allocated site**

The loss of visual amenity to existing residents is not considered to be a material issue.

- **Development is outside the existing settlement boundary**

Settlement boundaries were originally defined by the Council for the purpose of managing development as a part of the Adopted Vale of Glamorgan Unitary Development Plan 1996-2011. The permanence of these designations was limited to the lifetime of the UDP and will always be subject to potential change. For the LDP, where settlement boundaries have been defined they have been redrawn by the Council to follow the existing settlements including the proposed housing allocations.

- **Poor public transport provision**

The Council will ensure that future development of the site will contribute to sustainable transport in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations.

- **Already an availability of brownfield land to develop on for housing**

The LDP housing allocations include brownfield development sites which the Council's considers are in accordance with the LDP Strategy. Whilst it is accepted that there are brownfield sites elsewhere in the Vale of Glamorgan it is not necessarily the case that these sites are compatible with the LDP strategy or available for development e.g. isolated locations away from existing settlements.

- **Council should support existing employment areas instead of allocating new sites**

The LDP promotes a range of employment allocations within the Vale of Glamorgan to support local and regional economic growth. The identification of the St Athan - Cardiff Airport Enterprise Zone within the LDP reflects the long term development proposals by the Welsh Government and will ensure that future planning proposals for the site are undertaken in accordance with the policy requirements of the LDP.

- **Insufficient highway capacity to cope with additional traffic**

A general response to this issue is contained in paragraph 3.1.1. The Council is of the opinion that in preparing the LDP the Council has sought to ensure that it has appropriate level of understanding regarding the potential increase in demand for road space generated by the proposed housing growth of the LDP. The Highway Impact Assessment provides sufficient detail on the likely traffic impact of development to that the Council can require developers to provide the necessary transport improvements to accommodate the future planned housing growth in the Vale of Glamorgan.

Consequently, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed and shall seek to ensure that future development mitigate the anticipated increase in traffic, therefore addressing the concerns raised through the LDP consultation.

Site MG2- 4 Former Stadium Site / Land adjacent to Burley Place, St. Athan		
Representor ID and Name		
ID-2036/4/3 ID-2267/9/1	ID-2396/1/10 ID-4673/1/14	ID-5288/1/1 ID-5651/1/1
<p>Summary of the Grounds of Objection</p> <ul style="list-style-type: none"> • Level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone • Concern of the impact the development would have on the activity of the existing neighbouring golf course regarding safety • Concern over surface water run-off and potential for increased flood risk • Lack of local services and facilities to support additional development including schools, doctors and dentists etc. • Poor public transport provision- increased car usage and resulting traffic congestion • Concerns over additional traffic creating congestion on neighbouring roads to the site • Questions over employment opportunities for new residents 		
<p>Council Response</p> <ul style="list-style-type: none"> • Questions on the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone <p>In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the hierarchy. This approach is reflected in the level of growth apportioned to each settlement category within the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). For St Athan Strategic Opportunity Area, the Deposit LDP proposes the development of some 1300 dwellings on 6 sites reflecting its strategic importance in relation to the St Athan - Cardiff Airport Enterprise Zone.</p> <p>The housing allocations within the Deposit LDP have been made to reflect the strategic importance of the St Athan – Cardiff Airport Enterprise Zone, and the opportunity for local residents to access employment opportunities generated by the Enterprise Zone. They have been made to locate residential development close to future job creation and to take advantage of the local employment opportunities that the Enterprise Zone will offer. Whilst it is acknowledged there is no certainty that local residents will be employed at the St Athan Enterprise Zone it is considered appropriate and prudent to provide the opportunity for future employees to live in the local area.</p> <ul style="list-style-type: none"> • Concern of the impact the development would have on the activity of the existing neighbouring golf course regarding safety <p>Any future development of the site would be required to take into account the potential impacts on neighbouring uses.</p> <ul style="list-style-type: none"> • Concern over surface water run-off and potential for increased flood risk <p>A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (4) NRW have not raised any objection to the proposal.</p> <p>Additional Dwr Cymru, Welsh Water have advised that:</p>		

"The proposed development is in an area where there are water supply problems for which there are no improvements planned within our current Capital Investment Programme AMP5 (years 2010 to 2015). In order to establish what would be required to serve the site with an adequate water supply, it will be necessary for the developer to fund the undertaking of a hydraulic modelling assessment on the water supply network.

Our local sewerage network can accommodate foul flows from the proposed site but off-site sewers are required. These can be provided by a sewer requisition scheme, under Sections 98 – 101 of the Water Industry Act 1991. In terms of our Waste Water Treatment Works, your Authority are advised that the total density proposed for allocations in St. Athan will exceed the theoretical design of our West Aberthaw Outfall WwTW. Dependant on the pace and scale of development, there will ultimately be a time when increased capacity will be required, which will form part of our Asset Management Plan investment."

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Lack of local services and facilities to support additional development including schools, doctors and dentists**

A general response to this issue is contained in 3.1.3. Appendix 1 (p46) of the Infrastructure Plan sets out the planning requirements for the site MG2-4 including contributions for improved sustainable transport, additional schools places, a new on-site play area, enhanced community facilities in the St Athan ward, enhancement to St Athan library and built sports facilities.

In preparing the Deposit LDP, the Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities (such as new GP surgeries) would likely be required over the LDP period. This did not identify the St Athan area however it is anticipated that any required future investment in health provision would be funded by Welsh Government Health Department grants.

- **Poor public transport provision- increased car usage and resulting traffic congestion**

The Council will ensure future development of the site shall be required to contribute to sustainable transport in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations.

- **Concerns over additional traffic creating congestion on neighbouring roads to the site**

A general response to this issue is contained in paragraph 3.1.1. The Council is of the opinion that in preparing the LDP the Council has sought to ensure that it has appropriate level of understanding regarding the potential increase in demand for road space generated by the proposed housing growth of the LDP. The Highway Impact Assessment provides sufficient detail on the likely traffic impact of development to that the Council can require developers to provide the necessary transport improvements to accommodate the future planned housing growth in the Vale of Glamorgan.

Consequently, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed and shall seek to ensure that future development mitigate the anticipated increase in traffic, therefore addressing the concerns raised through the LDP consultation.

- **Questions over employment opportunities for new residents**

The St Athan and Cardiff Airport Enterprise Zone board is in the process of preparing a Strategic Development Framework for the Welsh Government which will inform detailed proposals for the Enterprise Zone. Further detail will also be contained within any future master plans for the strategic sites which will undergo public consultation. Residential allocations are proposed in the St Athan area in order to reflect the strategic importance of the St Athan Strategic Opportunity Area identified under Policy SP2 (Strategic Sites). This site is considered to form part of those allocations which support the development needs of the Strategic Site at St Athan and provide the opportunity for future employees to live in the area.

Site MG2-5 Land to the east of Eglwys Brewis, St Athan

Representor ID and Name

ID-1092/1/2	ID-2267/6/3	ID-5096/1/24
ID-1814/5/1	ID-2469/1/1	ID-5803/1/2
ID-2036/4/4	ID-4303/1/1	ID-5815/3/3
ID-2261/1/1	ID-4303/2/1	ID-6061/1/1
ID-2267/10/1	ID-4303/3/1	ID-6071/1/1
ID-2267/4/2	ID-4673/1/15	ID-6181/1/1

Summary of the Grounds of Objection

- The proposed northern access road is not required
- Loss of greenfield land
- Loss of biodiversity and ecology
- Proposal is prone to flooding
- Questions the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone
- No viable business plan to support the need for the Aerospace Business Park
- Lack of/ Pressure on existing local services and facilities including schools, dentists and doctors to support additional development
- Poor public transport provision
- Challenges the Vale of Glamorgan's housing need for the LDP
- Promotes Llandow as an alternative location for housing.

Council Response

- **The proposed northern access road is not required**

As part of the proposals for the Enterprise Zone at St Athan - Cardiff Airport the Deposit LDP identifies that highway access to the Aerospace Business Park at St Athan, needs to be significantly improved and will include the provision of a new Northern Access Road (NAR). The NAR was previously included in the proposals for the Defence Technical College and Aerospace Business Park. The NAR is considered essential to facilitate development at the Enterprise Zone and deliver the economic benefits to the Vale of Glamorgan and the wider region.

- **Loss of greenfield land**

A general response to this issue is contained in paragraph 3.1.5. In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has worked closely with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for

allocated sites .

With regard to site MG 2 (5) the Welsh Government has indicated that:

'Provisional ALC map shows the site as dominantly Provisional ALC Grade 2, with Grade 3 in western part of western parcel. Site appears in intensive agricultural use. Soils mapped as Ston Easton Association (Soils of Wales 1984). Despite its intensive use, the site is unlikely to be BMV. This is based on survey experience of this soil type, linked to topsoil clay content (soil workability limitations).'

In addition, information submitted in support of this site provides an Agricultural Land Classification Survey undertaken by Kernon Countryside Consultants Limited. The report confirms that the site does not contain any grade 1, 2 or 3a agricultural land and therefore does not comprise of the best and most versatile quality agricultural land.

Accordingly, it is considered that the proposed development would not adversely impact upon the best or most versatile agricultural land and would, therefore, be in accordance with Planning Policy Wales.

- **Loss of biodiversity and ecology**

A general response to this issue is contained in paragraph 3.1.6. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify potential impacts on ecology and biodiversity alongside other environmental constraints such as flooding. The Council is aware that Great Crested Newts, a European protected species have been recorded in the area. The proposals for development at this site will therefore need to ensure there is no likely detriment to the maintenance of the Favourable Conservation Status of these protected species, and comply with the Conservation of Habitats and Species Regulations 2010 (as amended). Accordingly a requirement to consult with NRW and to prepare an ecological survey has been included within the LDP to identify appropriate mitigation measures.

Representations from NRW on the Deposit LDP have since identified that the site supports populations of rare arable weeds including the critically endangered corn buttercup (*Ranunculus arvensis*) and Shepherds Needle (*Scandix pecten-veneris*). Whilst these have not been formally designated, NRW have requested the removal of the allocation from the LDP. These comments are noted and the Council will work with the landowner and NRW to establish the extent of the habitat and the potential for mitigation measures as part of a Conservation Strategy for the site. Soltys Brewster have prepared an Ecological desk study which has identified that mitigation measures which could include securing ongoing protection and management of the arable weeds on adjoining land and onsite protection and mitigation.

- **Proposal is prone to flooding/ drainage issues**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of flooding issues on allocation MG2 (5), NRW have not raised any objection to the proposal.

Representations submitted in support of the site provide a Flood Risk, Surface and Foul Water Assessment undertaken by Cambria Consulting Ltd. This Flood Risk assessment confirms that the majority of the site is located within the Development Advice Map (DAM) Zone A and is therefore considered to be at little or no risk of flooding. A small proportion of the site, to the site's northern boundary, is located within Zone C2 and is therefore located within an area at risk of flooding. However, the report considers that this can be appropriately managed within the detailed design of the scheme as an area potentially being utilised as

gardens or public open space. Built development could therefore be sited outside of the area of flood risk and the impacts of flooding would be able to be 'acceptably managed.' Therefore, it is considered that there are no significant flood risk or drainage constraints to the proposed residential development.

In addition, in respect of drainage Dwr Cymru Welsh Water have advised that:

"The proposed development is in an area where there are water supply problems for which there are no improvements planned within our current Capital Investment Programme AMP5 (years 2010 to 2015). In order to establish what would be required to serve the site with an adequate water supply, it will be necessary for the developer to fund the undertaking of a hydraulic modelling assessment on the water supply network.

Our local sewer network is too small to accommodate the foul flows from this development. A hydraulic modelling assessment will be required to establish the point of connection to the public sewer system and / or any improvement work required. In terms of our Waste Water Treatment Works, your Authority are advised that the total density proposed for allocations in St. Athan will exceed the theoretical design of our West Aberthaw Outfall WwTW. Dependent on the pace and scale of development, there will ultimately be a time when increased capacity will be required, which will form part of our Asset Management Plan investment."

In light of the Flood Risk Assessment report and comments provided by NRW and DCWW, the Council considers that the site is not significantly constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Questions the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone**

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the hierarchy. This approach is reflected in the level of growth apportioned to each settlement category within the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). For St Athan Strategic Opportunity Area, the Deposit LDP proposes the development of some 1300 dwellings on 6 sites reflecting its strategic importance in relation to the St Athan - Cardiff Airport Enterprise Zone.

The housing allocations proposed in the St Athan area have been made to reflect the strategic importance of the St Athan Aerospace Business Park and provide the opportunity for local residents to access employment opportunities generated by the Enterprise Zone. It is therefore not the case that the housing allocations have been made to directly support the development of the Enterprise Zone. They have been made to locate residential development close to future job creation and to take advantage of the local employment opportunities that the Enterprise Zone will offer. Whilst it is acknowledged there is no certainty that local residents will be employed at the St Athan Enterprise Zone it is considered appropriate and prudent to provide the opportunity for future employees to live in the local area.

- **No viable business plan to support the need for the Aerospace Business Park**

The Welsh Government is in the process of preparing a development framework for the future development of the St Athan - Cardiff Airport Enterprise Zone which will provide further details of the proposals set out in the LDP. Residential allocations are proposed in the St Athan area in order to reflect the strategic importance of the St Athan Strategic Opportunity Area identified under Policy SP2 (Strategic Sites). This site is considered to form part of those allocations which support the development needs of the Strategic Site at St Athan and provide the opportunity for future employees to live in the area.

- **The disproportionate level of housing proposed within St Athan**

The strategic housing allocations within the Deposit LDP have been made to reflect the strategic importance of the St Athan – Cardiff Airport Enterprise Zone, and provide the opportunity for local residents to access employment opportunities generated by the Enterprise Zone. They have been made to locate residential development close to future job creation and to take advantage of the local employment opportunities that the Enterprise Zone will offer. Whilst it is acknowledged there is no certainty that local residents will be employed at the St Athan Enterprise Zone it is considered appropriate and prudent to provide the opportunity for future employees to live in the local area. Notwithstanding this, it is considered that the residential allocations adjoining St Athan form a logical extension to the Village which also contribute towards meeting local housing need.

Paragraph 6.12 states that ‘the spatial distribution of allocated sites reflects the strategic importance of Barry and St Athan area, and recognises the need to ensure the provision of a range and choice of land for housing throughout the Vale of Glamorgan. Sites have been allocated in settlements which the Council considers are the more appropriate to assimilate new development.’. In terms of distribution, the LDP has made provision for 9% of residential allocations within the Llantwit Major area and 11% in the St Athan area. Further details on the Council's approach to phasing are provided in the Housing Supply background paper (2013).

Therefore, no change is considered to be required to ensure the soundness of the Plan.

- **Lack of/ Pressure on existing local services and facilities including schools, dentists and doctors to support additional development**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p47) of the Infrastructure Plan sets out the planning requirements for the site MG2-5 including contributions for improved sustainable transport, additional schools places, a new on-site play area, enhanced community facilities in the St Athan ward, enhancement to St Athan library and built sports facilities.

In preparing the Deposit LDP, the Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities (such as new GP surgeries) would likely be required over the LDP period. This did not identify the St Athan area however it is anticipated that any required future investment in health provision would be funded by Welsh Government Health Department grants.

- **Poor public transport provision**

The Council will ensure that the future development of the site will contribute to sustainable transport provision in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations.

- **Challenges the Vale of Glamorgan's housing need for the LDP**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement for the LDP period, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing need. The development of this site alongside other allocations within St Athan will assist in proving for the overall housing requirement in the Vale of Glamorgan.

- **Promotes Llandow as an alternative location for housing.**

Through the candidate sites submissions stage, the Council received some 420 sites for consideration for development; the majority of these were located in rural locations on greenfield land or adjoining the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the basis that it would be contrary to the overarching LDP strategy. Further details on this are set out in the Council's Revised Options Appraisal Background Paper.

Site MG2-6 Land adjacent to Froglands Farm, Llantwit Major

Representor ID and Name

ID-1092/1/3	ID-5479/1/2	ID-5803/1/3
ID-1814/6/2	ID-5503/1/3	ID-5815/3/4
ID-2260/1/4	ID-5557/1/2	ID-5932/1/1
ID-2267/4/3	ID-5560/1/2	ID-5935/1/1
ID-2396/1/8	ID-5566/1/3	ID-6053/4/1
ID-3600/3/4	ID-5570/1/2	ID-6107/1/1
ID-5272/1/1	ID-5628/1/4	ID-6113/1/1
ID-5477/1/2	ID-5628/1/6	

Summary of the Grounds of Objection

- The proposed northern access road is not required
- Loss of greenfield land
- Loss of biodiversity and ecology
- Questions the need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone
- The disproportionate level of housing proposed within St Athan
- Challenges the Vale of Glamorgan's housing need for the LDP
- Promotes Llandow as an alternative location for housing
- Surplus of brownfield sites available as alternatives
- Not a natural extension to existing settlement and therefore could constitute a new settlement (ID:1814/6/4)
- No viable business plan to support the need for the Aerospace Business Park
- Lack of/ Pressure on existing local services and facilities including schools, dentists and doctors to support additional development
- Poor public transport provision
- Proposal is prone to flooding
- The site is incorrectly linked with the village of St Athan when it forms part of Llanmaes village
- Site lies within the green wedge between the village of Llanmaes and the properties to the East of Eglwys Brewis Road. (ID: 3600/3/4)
- Site is on prime agricultural land
- Promotes Llandow as an alternative location for housing

Council Response

- **The proposed northern access road is not required**

As part of the proposals for the Enterprise Zone at St Athan – Cardiff Airport the Deposit LDP identifies that highway access to the Aerospace Business Park at St Athan needs to be significantly improved and includes the provision of a new Northern Access Road (NAR). The NAR was previously included in the proposals for the Defence Technical College and Aerospace Business Park. The NAR is considered essential to facilitate

development at the Enterprise Zone and deliver the economic benefits to the Vale of Glamorgan and wider region.

- **Loss of greenfield land**

A general response to this issue is contained in paragraph 3.1.5. In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has worked closely with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites. With regard to site MG 2 (6) the Welsh Government has indicated that:

'Provisional ALC map shows the site as mainly Non-agricultural, with a thin strip of Grade 2 at the northern boundary and adjoining provisional Grade 2 land. The site was mapped as Grade 2 agricultural land in a 1979 reconnaissance survey (008/79). The site currently appears in intensive agricultural use, though the western parcel may be used for caravans. Soils mapped as Ston Easton Association (Soils of Wales 1984). Despite its intensive use, the site is unlikely to be BMV. This is based on survey experience of this soil type, linked to topsoil clay content (soil workability limitations).

Accordingly, it is considered that the proposed development would not adversely impact upon the best or most versatile agricultural land and would, therefore, be in accordance with National Planning Policy Wales.

- **Loss of biodiversity and ecology**

A general response to this issue is contained in paragraph 3.1.6. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding alongside potential impacts on ecology. In respect of allocation MG2 (6), NRW have not raised an objection to the proposal but have advised that Great Crested Newt (a European protected species), bats and dormice have been recorded in an area linked to the site. Proposals for development at these sites will therefore need to ensure there is no likely detriment to the maintenance of the Favourable Conservation Status of these protected species, and comply with the Conservation of Habitats and Species Regulations 2010 (as amended).

- **Questions on the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone**

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the hierarchy. This approach is reflected in the level of growth apportioned to each settlement category within the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). For St Athan Strategic Opportunity Area, the Deposit LDP proposes the development of some 1300 dwellings on 6 sites reflecting its strategic importance in relation to the St Athan - Cardiff Airport Enterprise Zone.

The housing allocations within the Deposit LDP have been made to reflect the strategic importance of the St Athan – Cardiff Airport Enterprise Zone, and provide the opportunity for local residents to access employment opportunities generated by the Enterprise Zone. They have been made to locate residential development close to future job creation and to take advantage of the local employment opportunities that the Enterprise Zone will offer. Whilst it is acknowledged there is no certainty that local residents will be employed at the St Athan Enterprise Zone it is considered appropriate and prudent to provide the opportunity for future employees to live in the local area.

- **Challenges the Vale of Glamorgan's housing need for the LDP**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement over the LDP, further information on this is set out in the Housing Provision (2015) background paper. On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of the site will assist in proving for the overall housing requirement in the Vale of Glamorgan.

- **Promotes Llandow as an alternative location for housing**

Through the candidate sites submissions stage, the Council received some 420 sites for consideration for development, the majority of which were located in rural locations on Greenfield land or adjoining the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the basis that it would be contrary to the overarching LDP strategy. Further details on this are set out in the Council's Revised Options Appraisal Background Paper.

- **Surplus of brownfield sites available as alternatives**

The LDP housing allocations include brownfield development sites which the Council's consider are in accordance with the LDP Strategy. While it is accepted that there are brownfield sites elsewhere in the Vale of Glamorgan it is not necessarily the case that these sites are compatible with the LDP strategy or are readily available for development. Indeed the fact that a brownfield exists does not mean that it is suitable or available for development, particularly where these are in isolated locations away from existing settlements.

- **Not a natural extension to existing settlement and therefore could constitute a new settlement (ID:1814/6/4)**

It is the Council opinion that the proposals offers a logical extension to St Athan and would complement the implementation of the Aerospace Northern Access Road, which will provide a defensible boundary

- **No viable business plan to support the need for the Aerospace Business Park**

The Welsh Government is in the process of preparing a Strategic Development Framework for the future development of the St Athan - Cardiff Airport Enterprise Zone which will provide further details of the proposals set out in the LDP. Residential allocations are proposed in the St Athan area in order to reflect the strategic importance of the St Athan Strategic Opportunity Area identified under Policy SP2 (Strategic Sites). This site is considered to form part of those allocations which support the development needs of the Strategic Site at St Athan and provide the opportunity for future employees to live in the area.

- **Lack of/ Pressure on existing local services and facilities including schools, dentists and doctors to support additional development**

Appendix 1 (p48) of the Infrastructure Plan sets out the planning requirements for the site MG2 (6) including contributions for improved sustainable transport, additional schools places, a new on-site play area, enhanced community facilities in the St Athan ward, enhancement to St Athan library and built sports facilities.

In preparing the Deposit LDP, the Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities (such as new GP surgeries) would likely be required over the LDP period. This did not identify the St Athan area however it is anticipated that any required future investment in health provision would be funded by Welsh Government Health Department grants.

- **Poor public transport provision**

The Council shall ensure future development of the site shall be required to contribute to sustainable transport provision in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations.

- **Proposal is prone to flooding**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of flooding issues on allocation MG2 (6), NRW have not raised any objection to the proposal.

- **The site is incorrectly linked with the village of St Athan when it forms part of Llanmaes village**

The allocated site will form part of the St Athan - Cardiff Airport Enterprise Zone and the St Athan Strategic Opportunity Area. The site is listed in policy MG2 (6) as being located within Llantwit Major as it falls within the Llantwit Major Ward (as is the case for housing allocation MG2 (7)). It is also physically detached from Llanmaes and the Council is of the opinion that the site has a stronger physical relationship with western areas of St Athan hence its identification under MG2 as a strategic housing site reflecting its relationship with the St Athan - Cardiff Airport Enterprise Zone. Accordingly, it is the Council's view that it has correctly described the site and that it would be inappropriate to list the site as being located within Llanmaes.

- **Site lies within the green wedge between the village of Llanmaes and the properties to the East of Eglwys Brewis road (Representation 3600/3/4)**

There is currently no green wedge allocated in the deposit LDP between Llanmaes and the properties to the East of Eglwys Brewis, and no green wedge was designated within this area in the Vale of Glamorgan UDP.

- **Site is on prime agricultural land**

A general response to this issue is contained in paragraph 3.1.5. With regard to site MG 2 (6) the Welsh Government has indicated that:

'Provisional ALC map shows the site as mainly Non-agricultural, with a thin strip of Grade 2 at the northern boundary and adjoining provisional Grade 2 land. The site was mapped as Grade 2 agricultural land in a 1979 reconnaissance survey (008/79). The site currently appears in intensive agricultural use, though the western parcel may be used for caravans. Soils mapped as Ston Easton Association (Soils of Wales 1984). Despite its intensive use, the site is unlikely to be BMV. This is based on survey experience of this soil type, linked to topsoil clay content (soil workability limitations).

Accordingly, it is considered that the proposed development would not adversely impact upon the best or most versatile agricultural land and would, therefore, be in accordance with National Planning Policy Wales.

Site MG2-7 Land between new Northern Access Road and Eglwys Brewis Road, Llantwit Major		
Representor ID and Name		
ID-291/1/1	ID-5272/1/2	ID-5570/1/3
ID-291/2/1	ID-5373/1/1	ID-5628/1/5
ID-1092/1/4	ID-5477/1/3	ID-5628/1/7

ID-1814/6/1 ID-2036/4/5 ID-2260/1/5 ID-2267/4/4 ID-2396/1/9 ID-3600/3/5 ID-3918/3/1 ID-5096/1/25	ID-5479/1/3 ID-5503/1/4 ID-5541/1/1 ID-5557/1/5 ID-5558/1/2 ID-5560/1/3 ID-5566/1/4	ID-5759/1/2 ID-5803/1/4 ID-5815/3/5 ID-5932/1/2 ID-5935/1/2 ID-6113/1/2 ID-6130/1/1
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Summary of the Grounds of Objection

- The proposed northern access road is not required
- Loss of greenfield land
- Loss of biodiversity and ecology
- Proposal is prone to flooding
- Questions on the level and need for housing within the area to support the proposed Aerospace Business Park Enterprise Zone
- Challenges the Vale of Glamorgan's housing need for the LDP
- Promotes Llandow as an alternative location for housing
- No viable business plan to support the need for the Aerospace Business Park
- Lack of/ Pressure on existing local services and facilities including schools, dentists and doctors to support additional development
- Poor public transport provision

Council Response

- **The proposed northern access road is not required**

As part of the proposals for the St Athan - Cardiff Airport Enterprise Zone the DLDP identifies that highway access to the Aerospace Business Park at St Athan, needs to be significantly improved and will include the provision of a new Northern Access Road (NAR). The NAR was previously included in the proposals for the Defence Technical College and Aerospace Business Park. The NAR is considered essential to facilitate development at the Enterprise Zone and deliver the economic benefits to the Vale of Glamorgan and wider region.

- **Loss of greenfield land**

A general response to this issue is contained in paragraph 3.1.5. In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has worked closely with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites. With regard to site MG2 (7) the Welsh Government has indicated that:

Site is shown on the provisional ALC map as ALC Grade 2. There are no post 1988 ALC surveys for this site. The area was surveyed at reconnaissance level as part of a much larger ALC survey in 1979 (008/79). This shows the site as a mix of ALC Grade 2, Subgrade 3a, 3c and Grade 4. As this survey predates 1989, further assessment would be needed to confirm grading. Mapped soil type is consistent throughout the site (Ston Easton Association). Based on previous experience of mapping this soil, there is a low probability of BMV, based primarily on soil limitations. A site specific survey would be required for definite grading'

Accordingly, it is considered that the proposed development is unlikely to adversely impact upon the best or most versatile agricultural land and would, therefore, be in accordance with National Planning Policy Wales (detriment to a site specific survey).

- **Loss of biodiversity and ecology**

A general response to this issue is contained in paragraph 3.1.6. In preparing the DLDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding alongside potential impacts on ecology. In respect of allocation MG2 (7) NRW have advised that Great Crested Newts (a European protected species), bats and dormice have been recorded in an area linked to the site. Proposals for development at these sites will therefore need to ensure there is no likely detriment to the maintenance of the Favourable Conservation Status of these protected species, and comply with the Conservation of Habitats and Species Regulations 2010 (as amended).

- **Proposal is prone to flooding**

A general response to this issue is contained in paragraph 3.1.4. In preparing the DLDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of flooding issues on allocation MG2 (7), NRW have advised the following:

"This allocation site is in proximity to two Main Rivers (Boverton Brook and Llanmaes Brook), which also includes part of a formal flood storage area constructed by Natural Resources Wales to help alleviate flooding at Boverton. No development is to take place within 7m of the Main Rivers or flood alleviation assets and we support the comments made in Appendix 6 of your Deposit Plan. We also require access across the site to allow maintenance of the system.

The site is partially located in Zone C2 of development advice map contained in TAN15 and is also shown to be located within Zones 2 and 3 of our Natural Resources Wales Flood Map. Highly vulnerable development should not be permitted within zone C2 of the development advice maps, in accordance with TAN15.

For awareness, we are in the process of constructing a hydraulic model of the Boverton area to establish potential additional flood alleviation measures in partnership with Vale of Glamorgan Council. We are also aware that your Council has separately commissioned modelling of the Llanmaes Brook and tributary within Llanmaes village for a flood alleviation scheme within the village. Both these projects will refine our knowledge of flood risk in the area and may identify additional potential flood alleviation measures that may include this site.

The catchment already experiences frequent flooding to property and is very sensitive to any changes affecting flows entering this catchment. We would advise against additional development unless an applicant can demonstrate by detailed hydraulic modelling that there is no effect on the existing flood regime; and that development will not limit further flood alleviation measures, which may be identified by the current investigations.

We would also advise that as Lead Local Flood Authority you are consulted as there may be additional surface water flood risk associated with this site."

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Questions on the level and need for housing within the area to support the proposed Aerospace**

Business Park Enterprise Zone

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the hierarchy. This approach is reflected in the level of growth apportioned to each settlement category within the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). For St Athan Strategic Opportunity Area, the Deposit LDP proposes the development of some 1300 dwellings on 6 sites reflecting its strategic importance in relation to the St Athan - Cardiff Airport Enterprise Zone.

The housing allocations within the Deposit LDP have been made to reflect the strategic importance of the St Athan – Cardiff Airport Enterprise Zone, and the opportunity for local residents to access employment opportunities generated by the Enterprise Zone. They have been made to locate residential development close to future job creation and to take advantage of the local employment opportunities that the Enterprise Zone will offer. Whilst it is acknowledged there is no certainty that local residents will be employed at the St Athan Enterprise Zone it is considered appropriate and prudent to provide the opportunity for future employees to live in the local area.

- **Challenges the Vale of Glamorgan's housing need for the LDP**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement for the LDP, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of this site alongside other allocations within St Athan will assist in providing for the overall housing requirement in the Vale of Glamorgan.

- **Promotes Llandow as an alternative location for housing**

Through the candidate sites submissions stage, the Council received some 420 sites for consideration for development, the majority of which were located in rural locations on greenfield land or adjoining the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the grounds that it would be contrary to the overarching LDP strategy. Further details on this are set out in the Council's Revised Options Appraisal Background Paper.

- **No viable business plan to support the need for the Aerospace Business Park**

The Welsh Government is in the process of preparing a development framework for the future development of the St Athan - Cardiff Airport Enterprise Zone which will provide further details of the proposals set out in the LDP. Residential allocations are proposed in the St Athan area in order to reflect the strategic importance of the St Athan Strategic Opportunity Area identified under Policy SP2 (Strategic Sites). This site is considered to form part of those allocations which support the development needs of the Strategic Site at St Athan and provide the opportunity for future employees to live in the area.

- **Lack of/ Pressure on existing local services and facilities including schools, dentists and doctors to support additional development**

Appendix 1 (p49) of the Infrastructure Plan sets out the planning requirements for the site MG2 (7) including contributions for improved sustainable transport, additional schools places, a new on-site play area, enhanced community facilities in the St Athan ward, enhancement to St Athan library and built sports facilities.

In preparing the Deposit LDP, the Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities (such as new GP surgeries) would likely be required over the LDP period. This did not identify the St Athan area however it is anticipated that any required future investment in health provision would be funded by Welsh Government Health Department grants.

- **Poor public transport provision**

The Council shall ensure future development of the site shall be required to contribute to sustainable transport in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations.

Site MG2- 8 Barry Island Pleasure Park

Representor ID and Name

ID-2036/4/6

Summary of the Grounds of Objection

- Challenges the deliverability of the allocation within the LDP period and proposes an alternative site.

Council Response

Part of the site has been subject to a planning application (14/013458/FUL). The proposal is for the demolition of the existing Dolphin bar/restaurant and redevelopment for 25 residential units, commercial uses and associated works. The application was approved by Planning Committee on 14th May 2015.

The Council considers that the remainder of the site can be delivered within the LDP period. It is noted that the site has previously had a resolution to grant an outline application, subject to a legal agreement, and therefore the principle of the development has been established. The ability for the developer to satisfy the required planning contributions on the grounds of viability was the reason why the outline planning permission was not issued. However, given the sites prominent location on Barry Island it is considered that a suitable scheme can be developed on the remaining site that can address these matters.

Site MG2 9 White Farm

Representor ID and Name

ID-5096/1/26

Summary of the Grounds of Objection

- National Resources Wales (NRW) (Representation 5096/1/25) raised concerns regarding the proximity of the SINC and the potential conflict with the proposed housing development, indicating that appropriate mitigation measures should be implemented to safeguard the nature conservation interests on the site.
- NRW indicate that appropriate measures are implemented to manage surface water run-off into the Coldbrook Catchment.

Council Response

The site now benefits from full planning consent and is currently under construction; the areas of objection within the representation would have been considered by the Council through consultations with NRW as part of the planning application process and in its decision to grant permission for development.

Site MG2-10 Land to the east of Pencoedtre Lane

Representor ID and Name

ID-5096/1/27
Summary of the Grounds of Objection
<ul style="list-style-type: none"> NRW require appropriate measures are implemented to manage surface water run-off into the Coldbrook Catchment.
Council Response
Development of the site has been completed.

Site MG2-11 Land to the west of Pencoedtre Lane
Representor ID and Name
ID-5096/1/27
Summary of the Grounds of Objection
<ul style="list-style-type: none"> NRW indicate that appropriate measures are implemented to manage surface water run-off into the Coldbrook Catchment.
Council Response
Matters associated with surface water management would form part of the planning application process and as a statutory consultee NRW would have the opportunity to scrutinise proposals for surface water management put forward by the developer.

Site MG2-12 Ysgol Maes Dyfan
No representations were received on this allocation

Site MG2-13 Barry Magistrates Court
No representations were received on this allocation
Council Response
It should be noted that development of the site has been completed.

Site MG2-14 Court Road Depot, Barry
Representor ID and Name
ID-2036/4/7 ID-5330/1/1 ID-6085/1/8
Summary of the Grounds of Objection
<ul style="list-style-type: none"> The site is currently operating as the Council's recycling depot and is therefore at present unavailable for redevelopment (Representation 2036/4/7) Redevelopment of the site for 50 dwellings would further reduce infrastructure within Barry (Representation 5330/1/1)
Council Response
The proposed site allocation has been identified by the Council as a site which is likely to become surplus to requirements during the plan period. It has therefore been included as a potential brownfield development site to meet local housing needs in Barry. If the site is vacated then consideration would be given towards rationalising or relocating the existing services and facilities currently accommodated on the site. Therefore, no change is therefore considered to be required to the LDP.

Site MG2-15 Holm View
No representations were received on this allocation

Site MG2-16 Hayes Wood, The Bendricks
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Representor ID and Name ID-3970/1/3
Summary of the Grounds of Objection <ul style="list-style-type: none"> The proposal to build residential units at Hayes Road will impact on the preferred use of the site for employment
Council Response It is the Council's opinion that development of site MG2 (16) would not have a detrimental impact on employment land supply in the Vale of Glamorgan. In assessing the Council's Employment Land and Premises Study (2013), the Hayes Wood site was excluded from the available employment land supply on the basis of it being developed for housing as proposed in the LDP. Its exclusion from the supply did not adversely impact on the LDP employment land supply. Given the close proximity of the Hayes Wood allocation to existing housing at the Bendricks it is considered that redevelopment of the site for housing would be appropriate re-use of the site.

Site MG2-17 Cowbridge Comprehensive Lower School		
Representor ID and Name		
ID-3678/1/1 ID-3772/1/3 ID-4182/1/3	ID-5186/1/3 ID-5239/1/1 ID-5303/2/3	ID-5523/1/3 ID-5755/1/3 ID-5756/1/3
No representations objecting to the site were received. There was general support for the allocation from representors objecting to MG2 (19) Land adjoining St. Athan Road, Cowbridge and MG2 (20) Land to the north and west of Darren Close, Cowbridge.		
Council Response Planning permission has been granted and development of the site has been completed.		

Site MG2-18 Cowbridge Comprehensive 6th Form Block, Aberthin Road, Cowbridge		
Representor ID and Name		
ID-178/4/9 ID-3678/1/2 ID-3772/1/4 ID-4182/1/4	ID-5186/1/4 ID-5239/1/2 ID-5303/2/4	ID-5523/1/4 ID-5755/1/4 ID-5756/1/4
Summary of the Grounds of Objection <ul style="list-style-type: none"> ID-178/4/9 objected to the proposal for housing and suggests that the site be used for the proposed Welsh Medium Primary School identified in the LDP under Policy MG 6 (6) 		
Council Response The site is owned by the Cowbridge Comprehensive School Trust and following the relocation of Cowbridge Comprehensive School is surplus to requirements. The site has therefore been identified for residential use within the LDP as it is likely to come forward for redevelopment. The LDP has already identified land and made provision for a new primary school in association with housing allocation MG2 (20) Land to the north west of Darren Close, Cowbridge. Therefore, the proposed change is not considered to be required.		

Site MG2- 19 Land adjoining St. Athan Road, Cowbridge		
Representor ID and Name		
ID-125/1/4	ID-4189/2/1	ID-5660/2/1
ID-1479/1/2	ID-4218/1/1	ID-5693/1/1
ID-2673/2/1	ID-4672/1/1	ID-5694/1/1
ID-3612/1/1	ID-4673/1/21	ID-5705/1/1
ID-3612/1/2	ID-4738/1/2	ID-5714/1/1
ID-3612/1/3	ID-4771/1/1	ID-5715/1/1
ID-3678/1/3	ID-4775/1/1	ID-5725/1/1
ID-3679/1/1	ID-4780/1/1	ID-5727/1/1
ID-3685/1/1	ID-4799/1/1	ID-5732/2/1
ID-3715/1/2	ID-4944/1/1	ID-5755/1/1
ID-3737/1/1	ID-4965/1/2	ID-5756/1/1
ID-3737/2/1	ID-4978/1/1	ID-5761/1/2
ID-3747/1/1	ID-4978/1/2	ID-5782/1/1
ID-3765/1/1	ID-5028/1/1	ID-5783/1/1
ID-3772/1/2	ID-5072/1/1	ID-5784/1/1
ID-3775/1/1	ID-5186/1/8	ID-5785/1/1
ID-3792/1/1	ID-5230/1/1	ID-5786/1/1
ID-3800/1/1	ID-5239/1/3	ID-5787/1/1
ID-3825/2/1	ID-5242/1/1	ID-5788/1/1
ID-3825/2/2	ID-5303/2/2	ID-5791/1/1
ID-3825/2/3	ID-5521/1/1	ID-5796/1/1
ID-3868/1/1	ID-5523/1/1	ID-5815/1/3
ID-3868/2/2	ID-5525/1/1	ID-5815/3/6
ID-3889/1/1	ID-5543/1/1	ID-5815/4/3
ID-3915/1/1	ID-5565/1/2	ID-5817/1/1
ID-3917/1/1	ID-5576/1/1	ID-5877/1/1
ID-3919/1/1	ID-5580/1/1	ID-5940/1/1
ID-3921/1/1	ID-5587/1/1	ID-6020/1/1
ID-3922/1/2	ID-5589/1/1	ID-6022/1/1
ID-3933/1/1	ID-5596/1/1	ID-6034/1/1
ID-3960/1/1	ID-5597/1/1	ID-6043/1/1
ID-4046/1/1	ID-5599/1/1	ID-6074/1/1
ID-4049/1/1	ID-5600/1/1	ID-6095/1/1
ID-4084/1/2	ID-5615/1/1	ID-6096/1/1
ID-4095/1/1	ID-5616/1/1	ID-6111/1/1
ID-4098/1/3	ID-5617/1/1	ID-6138/1/1
ID-4161/1/1	ID-5622/1/1	ID-6152/1/1
ID-4173/1/1	ID-5627/1/1	ID-6174/3/1
ID-4182/1/1	ID-5632/1/1	ID-6193/1/1
ID-4189/1/1	ID-5660/1/2	ID-6194/1/2
		ID-6233/1/1
Summary of the Grounds of Objection <ul style="list-style-type: none"> • Objection to the Council's Sustainable Settlements Appraisal in respect of Cowbridge • Objection to the disproportionate level of housing proposed for Cowbridge • Challenges the Vale of Glamorgan's housing need for the LDP • No identified requirement for affordable housing within Cowbridge • Loss of land identified as Special Landscape Area- adverse impact on the character and setting of 		

Cowbridge

- Development lies outside the UDP settlement boundary for Cowbridge
- Increased flood risk
- The existing sewage system is at capacity
- Loss of biodiversity and ecology
- Unsuitable access- development would increase the potential for highway accidents
- Loss of a public right of way
- Increase car use by residents to the town centre
- Lack of public car parking within Cowbridge and the proposals would increase car use by residents to the town centre
- Limited public transport provision
- Increased pressure on existing school provision and on local services, doctors, dentist etc.

Council Response

- **Objection to the Council's Sustainable Settlements Appraisal in respect of Cowbridge**

A general response to this issue is contained in 3.1.9. Within the LDP settlement hierarchy, the market town of Cowbridge ranked Cowbridge 4th overall amongst the settlements and categorised the town within the hierarchy as being a Service Centre Settlement, reflecting the level of services and facilities afforded to it. Accordingly, the Council is of the view that the identification of Cowbridge as a Service Centre Settlement within the LDP settlement hierarchy reinforces its long established role as an important rural centre, and is based on a robust assessment of the level of services available alongside its functional relationship with other settlements identified within the hierarchy.

- **Objection to the disproportionate level of housing proposed for Cowbridge**

A general response to this issue is contained in 3.1.9. For Cowbridge, the Deposit LDP proposes the development of some 561 dwellings on 4 sites (with 20 units allocated at MG2 (17) now completed). As the second largest rural settlement in the Vale of Glamorgan after Llantwit Major, but offering as wide a range of services and facilities as Llantwit Major, the Council is of the opinion that on the basis of housing numbers alone, the level of housing proposed for Cowbridge is appropriate in terms of its role as a Service Centre within the LDP.

- **Challenges the Vale of Glamorgan's housing need for the LDP**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement for the LDP, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of this site alongside other allocations within Cowbridge will assist in providing for the overall housing requirement in the Vale of Glamorgan.

- **No identified requirement for affordable housing within Cowbridge**

A general response to this issue is contained in paragraph 3.1.10. The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan. This indicates that within the rural housing market areas there is an affordable housing requirement of 35 dwellings per annum. The LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement

for 250 affordable dwellings between 2010 and 2015.

The study indicates that within the Cowbridge and Llanblethian Ward there is an overall annual requirement for 22 affordable dwellings. The study also reveals that there were 43 households living in unsuitable affordable housing (Table 6.3). Additionally, the study highlighted that 117 households stated that a member of their household had left the community due to a shortage of suitable housing locally (Table 7.9) Further, Appendix A 5 of the RHNA seeks to identify the overall anticipate housing requirement across all tenures (market and affordable housing) between 2010-2030, this projected a requirement for within the rural vale for some 3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Consequently, the Council is of the opinion that there is sufficient evidence to justify a requirement for the provision of housing growth within the rural Vale, and whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (20) will contribute to the identified housing need at the ward level and reduce the need for existing residents to address their housing requirements elsewhere.

- **Loss of land identified as Special Landscape Area- adverse impact on the character and setting of Cowbridge**

The Council is of the opinion that the development of MG2 (19) would have limited impact on the Upper and Lower Thaw Valley Special Landscape Area.

- **Development lies outside the UDP settlement boundary for Cowbridge**

The Cowbridge settlement boundary was original defined by the Council for the Vale of Glamorgan Unitary Development Plan. For the LDP and for those settlements afforded settlement boundaries these have been amended to accommodate housing allocations proposed within the LDP and any physical changes that have taken place since the settlement boundaries were originally identified. Consequently, the permanence of settlement boundaries is limited to the lifetime of a statutory plan and therefore will be the subject to review and potential change.

- **Increased flood risk**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (19) NRW have not raised any objection to the proposals in respect of flooding or increased risk of flooding.

- **The existing sewage system is at capacity**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Dwr Cymru Welsh Water (DCWW) on the necessary infrastructure requirements to support the levels of development proposed within the LDP. In respect of allocation MG2 (19) Dwr Cymru Welsh Water have not raised any objection to the proposals but have submitted the following site specific commentary:

"The Cowbridge area is an area where there is poor water pressure and in order to provide guaranteed water supplies to these allocations a new booster station is required. Our current Asset Management Plan which runs to year 2015 does not include this works. Should potential developers wish to develop this allocation in advance of our planned Regulatory investment, then the Requisition provisions of the Water Industry Act can apply.

Additionally, the foul drainage from this allocation will drain to our Broomfield Sewage Pumping Station and an assessment will be required to establish what improvements are required to allow this allocation to be delivered. Should potential developers wish to develop this allocation in advance of our planned Regulatory investment, then the Requisition provisions of the Water Industry Act can apply.

Potential developers need to be aware that the site is crossed by a 65mm diameter rising main that runs parallel to St. Athan Road. This sewer may restrict the amount of density proposed and protection measures in the form of easement widths or a diversion of the pipe would be required.

In terms of our Waste Water Treatment Works, your Authority are advised that the total density proposed for allocations in Cowbridge (which includes Colwinston and Ystradowen) will exceed the theoretical design of our Cowbridge WwTW. Dependent on the pace and scale of development, there will ultimately be a time when increased capacity will be required, which will form part of our Asset Management Plan investment."

- **Loss of biodiversity and ecology**

A general response to this issue is contained in paragraph 3.1.6. In preparing the LDP all sites submitted for consideration have been subject to the Council's Site Assessment Appraisal. This included consultation with Natural Resources Wales (formerly Countryside Council for Wales CCW) who provided advice on sites, alongside closely working with the Council's biodiversity officer to ensure the integration of the Council's SINC study within the LDP process. No objections have been raised to the housing allocation in respect of the loss of biodiversity or impact on ecology.

- **Unsuitable access- development would increase the potential for highway accidents**

The Council's Highway development officers have advised that any development will be required to provide safe and appropriate highway access. This would be a matter for consideration as part of any future planning application on the site and Appendix 5 of the Deposit LDP sets out the planning requirements for the site, and states that "the development will be required to fund and implement highway improvement works in the form of a realignment of St Athan Road". In doing so, the Council is of the opinion that the proposal would allow for safety improvements of St Athan Road.

- **Loss of a public right of way**

Any future development proposal will be required to ensure that the existing public right of way would be maintained and incorporated into the site layout of the development.

- **Increase car use by residents to the town centre**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Lack of public car parking within Cowbridge and the proposals would increase car use by residents to the town centre**

It is the Council's opinion that the site is reasonably located to the centre of Cowbridge to enable future residents to walk and/or cycle into the town centre. Additionally, the current parking issues within Cowbridge could be addressed through appropriate parking management measures - presently parking within Cowbridge is not restricted to time or charged for and as such there is currently no incentive to use sustainable transport. Furthermore, the LDP seeks to promote the use of sustainable transport in line with National Planning Policy, and the provision of car parking would therefore be contrary to national and local objectives.

- **Limited public transport provision**

The Council is of the opinion that Cowbridge is well serviced by public transport with services to Bridgend and Cardiff as well as local services within the Vale of Glamorgan itself. This is reflected in the Council's assessment of transport provision detailed in the Sustainable Settlement Appraisal Background Document which identified that Cowbridge was 4th overall in terms of its score for public transport provision (Appendix 5, page 28 refers). Additionally, future development proposals in Cowbridge will also be required to contribute towards the provision and enhancement of public transport services in accordance with policy MD4 Community Infrastructure and Planning Obligations.

- **Increased pressure on existing school provision and on local services, doctors, dentist etc.**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p61) of the Infrastructure Plan sets out the planning requirements for the site MG2-19 including contributions for improved sustainable transport, additional schools places, a new play area and built sports facilities.

Site MG2- 20 Land to the north and west of Darren Close, Cowbridge

And Associated Policies:

MG16 (19) Link Road between A48 and Llantwit Major Road, Cowbridge

MG6 (4) New Welsh Medium Primary School at Land to the North and West of Darren Close, Cowbridge

Representor ID and Name

ID-80/1/2	ID-5249/1/1	ID-5711/1/1
ID-117/1/1	ID-5249/2/1	ID-5713/1/1
ID-117/1/2	ID-5252/1/1	ID-5719/1/1
ID-125/1/5	ID-5257/1/1	ID-5722/1/1
ID-178/1/1	ID-5263/1/1	ID-5723/1/1
ID-178/4/3	ID-5266/1/1	ID-5728/1/1
ID-2221/1/1	ID-5293/1/1	ID-5729/1/1
ID-2329/1/1	ID-5303/1/1	ID-5731/1/1
ID-2622/1/1	ID-5303/2/1	ID-5732/1/1
ID-2627/1/1	ID-5308/1/1	ID-5744/1/1
ID-2673/1/1	ID-5338/1/1	ID-5746/1/1
ID-2673/1/2	ID-5339/1/1	ID-5749/1/1
ID-3554/1/1	ID-5340/1/1	ID-5750/1/1
ID-3652/1/1	ID-5341/1/1	ID-5755/1/2
ID-3675/1/1	ID-5347/1/1	ID-5756/1/2
ID-3678/1/4	ID-5349/1/1	ID-5761/1/4
ID-3683/1/1	ID-5357/1/1	ID-5762/1/1
ID-3705/1/1	ID-5358/1/1	ID-5767/1/1
ID-3715/1/1	ID-5359/1/1	ID-5768/1/1
ID-3765/1/2	ID-5364/1/1	ID-5770/1/1
ID-3772/1/1	ID-5367/1/1	ID-5772/1/1
ID-3825/1/1	ID-5393/1/1	ID-5775/1/1
ID-3868/1/2	ID-5408/1/1	ID-5780/1/1
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ID-3904/1/1	ID-5415/1/1	ID-5816/1/1
ID-3922/1/1	ID-5417/1/1	ID-5818/1/1
ID-3933/2/1	ID-5428/1/1	ID-5873/1/1
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ID-3988/1/1	ID-5439/1/1	ID-5919/1/1
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ID-4084/1/3	ID-5492/1/1	ID-5939/1/1
ID-4098/1/2	ID-5498/1/1	ID-5947/1/1
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ID-4127/1/2	ID-5505/1/1	ID-6008/1/1
ID-4182/1/2	ID-5508/1/1	ID-6010/1/1
ID-4186/1/1	ID-5510/1/1	ID-6012/1/1
ID-4218/2/1	ID-5511/1/1	ID-6013/1/1
ID-4612/1/1	ID-5512/1/1	ID-6014/1/1
ID-4673/1/22	ID-5517/1/1	ID-6014/1/2
ID-4738/1/1	ID-5519/1/1	ID-6015/1/1
ID-4775/1/2	ID-5520/1/1	ID-6016/1/1
ID-4822/1/1	ID-5523/1/2	ID-6017/1/1
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ID-4929/1/1	ID-5526/1/1	ID-6023/1/1
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ID-4982/1/1	ID-5565/1/1	ID-6045/1/1
ID-4982/2/1	ID-5577/1/1	ID-6059/1/1
ID-5096/1/28	ID-5579/1/1	ID-6077/1/1
ID-5186/1/1	ID-5579/1/2	ID-6078/1/1
ID-5186/1/2	ID-5580/1/2	ID-6081/1/1
ID-5190/1/1	ID-5581/1/1	ID-6086/1/1
ID-5191/1/1	ID-5585/1/1	ID-6087/1/1
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ID-5203/1/1	ID-5587/1/2	ID-6090/1/1
ID-5209/1/1	ID-5588/1/1	ID-6096/1/2
ID-5213/1/1	ID-5631/1/1	ID-6097/1/1
ID-5215/1/1	ID-5637/1/1	ID-6098/1/1
ID-5219/1/1	ID-5638/1/1	ID-6100/1/1
ID-5223/1/1	ID-5645/1/1	ID-6102/1/1
ID-5224/1/1	ID-5647/1/1	ID-6103/1/1
ID-5227/1/1	ID-5653/1/1	ID-6104/1/1
ID-5227/1/2	ID-5654/1/1	ID-6109/1/1
ID-5230/1/2	ID-5654/2/1	ID-6111/1/2
ID-5232/1/1	ID-5656/1/1	ID-6112/1/1
ID-5233/1/1	ID-5660/1/1	ID-6115/1/1
ID-5237/1/1	ID-5686/1/1	ID-6118/1/1
ID-5238/1/1	ID-5696/1/1	ID-6120/1/1
ID-5238/2/1	ID-5699/1/1	ID-6122/1/1
ID-5239/1/4	ID-5702/1/1	ID-6123/1/1
ID-5240/1/1	ID-5707/1/1	ID-6138/1/2
ID-5241/1/1	ID-5708/1/1	ID-6157/1/1
ID-5242/1/2	ID-5709/1/1	ID-6201/1/1
ID-5245/1/1	ID-5710/1/1	

Summary of the Grounds of Objection

- Objection to the Council's Sustainable Settlements Appraisal in respect of Cowbridge
- General objection to the disproportionate level of housing proposed for Cowbridge
- Challenges the Vale of Glamorgan's housing need for the LDP
- No identified requirement for affordable housing within Cowbridge
- Loss of land identified as Special Landscape Area- adverse impact on the character and setting of Cowbridge
- Development lies outside the UDP settlement boundary for Cowbridge
- Negative impact on the livelihood of the tenant farmer
- Proposal was previously rejected by a Planning Inspector at appeal
- Increased flood risk
- The existing sewage system is at capacity
- Loss of biodiversity and ecology
- Increase car use by residents to the town centre
- Lack of public car parking within Cowbridge
- The proposed bypass would not resolve current traffic congestion problems in Cowbridge

- New school is not required
- Limited employment opportunities
- Limited public transport provision
- Impact on services and facilities-, and specifically public transport provision, increased pressure on existing school provision/and or the school is not required, increased pressure for local services- doctors, dentist etc.

Council Response

- **The proposal was previously rejected by a Planning Inspector at appeal**

Representations submitted on site MG2 (20) have highlighted that the site should be excluded from the LDP as it has been the subject of previous appeals that were dismissed by a planning inspector on the grounds that the proposal would represent an unnecessary extension of urban development into open countryside and would undermine the Council's own proposals for the Llysworney Bypass.

However, objections to the current proposal have omitted the fact that the site was also previously recommended for inclusion in the Adopted Vale of Glamorgan UDP by the appointed Planning Inspector. During the EiP on the UDP, the grounds of objection matters raised within the representations made on the current LDP allocation were also considered – primarily negative impact on the landscape and archaeology features; the loss of agricultural land and the provision of a new link road (Vale of Glamorgan Unitary Development Plan Report on the Objections November 2000).

In considering these matter the Inspector on the UDP concluded:

"that there is no overriding landscape or archaeological constraints to the development of the objection site, and; that the loss of agricultural land is not so significant as to override the need for the further development of Cowbridge"

"Whilst the construction of the link road and associate traffic management will not remove all the traffic from Llysworney I consider substantial environmental benefits would be produced for Cowbridge and that village. Such benefits clearly outweigh any disadvantages and add weight to my conclusion that the development at Darren Farm should be accepted" (page 4.56 refers)

Whilst at the time of the UDP inquiry the Council defended its decision to exclude Darren Farm from the UDP, the Council is now of the opinion that the proposed development would contribute in the delivery of the LDP strategy, consistent with the role and function of Cowbridge as set out in the LDP settlement hierarchy, assist in the delivery of the identified housing requirement, whilst also providing a valuable source of affordable housing within the rural Vale of Glamorgan. Additionally, the allocation would deliver key infrastructure in the form of a much needed Primary School, and in the absence of funding for the delivery of a Llysworney bypass, the allocation shall also enable the delivery of a link road to assist in alleviating existing traffic congestion within Cowbridge.

- **Objection to the Council's Sustainable Settlements Appraisal in respect of Cowbridge**

A general response to this issue is contained in paragraph 3.1.9. The Sustainable Settlements Appraisal Background Paper set out the proposed settlement hierarchy for the Vale and identifies the market town of Cowbridge ranked Cowbridge 4th overall amongst the settlements. It is categorised within the hierarchy as being a Service Centre Settlement, reflecting the level of services and facilities afforded to it. Accordingly, the Council is of the view that the identification of Cowbridge as a Service Centre Settlement within the LDP

settlement hierarchy reinforces its long established role as an important rural centre, and is based on a sound assessment of the level of services available alongside its functional relationship with other settlements identified within the hierarchy.

- **Objection to the disproportionate level of housing proposed for Cowbridge**

A general response to this issue is contained in 2.1.9. For Cowbridge, the Deposit LDP proposes the development of some 561 dwellings on four sites (with 20 units allocated at MG2 (17) now completed). As the second largest rural settlement in the Vale of Glamorgan after Llantwit Major, but offering as wide a range of services and facilities as Llantwit Major, the Council is of the opinion that on the basis of housing numbers alone, the level of housing proposed for Cowbridge is appropriate in terms of its role as a Service Centre with in the LDP.

- **Challenges the Vale of Glamorgan's housing need for the LDP**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement for the LDP, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of this site alongside other allocations within Cowbridge will assist in providing for the overall housing requirement in the Vale of Glamorgan.

- **No identified requirement for affordable housing within Cowbridge**

A general response to this issue is contained in paragraph 3.1.10. The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan. This indicates that within the rural housing market areas there is an affordable housing requirement of 35 dwellings per annum. The LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 2015.

This indicates that within the Cowbridge and Llanblethian Ward there is an overall annual requirement for 22 affordable dwellings. The study also reveals that there were 43 households living in unsuitable affordable housing (Table 6.3). Additionally, the study highlighted that 117 households stated that a member of their household had left the community due to a shortage of suitable housing locally (Table 7.9). Additionally, Appendix A 5 of the RHNA seeks to identify the overall anticipated housing requirement across all tenures (market and affordable housing) between 2010-2030, this projected a requirement within the rural Vale for some 3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Consequently, the Council is of the opinion that there is sufficient evidence to justify a requirement for the provision of housing growth within the rural Vale, and whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (20) will contribute to the identified housing need at the ward level and reduce the need for existing residents to address their housing requirements elsewhere.

- **Loss of land identified as Special Landscape Area - adverse impact on the character and setting of Cowbridge**

The Council is of the opinion that the development of MG2 (20) would have limited impact on the Upper and Lower Thaw Valley Special Landscape Area. Indeed as pointed out above, this matter was considered during

the Vale of Glamorgan Unitary Development Plan inquiry, which the appointed inspector concluded that there is “no overriding landscape constraint”.

- **Development lies outside the UDP settlement boundary for Cowbridge**

The Cowbridge settlement boundary was originally defined by the Council for the Vale of Glamorgan Unitary Development Plan. For the LDP and for those settlements afforded settlement boundaries these have been amended to accommodate housing allocations proposed within the LDP and any physical changes that have taken place since the settlement boundaries were originally identified. Consequently, the permanence of settlement boundaries is limited to the lifetime of a statutory plan and therefore will be the subject to review and potential change.

- **Negative impact on the livelihood of the tenant farmer**

Whilst the tenant farmer has raised objections to MG2 (20) citing the loss of livelihood as a result of the proposal, no substantive evidence has been submitted to support this statement.

- **The existing sewerage system is at capacity**

In preparing the Deposit LDP the Council consulted with Dwr Cymru Welsh Water (DCWW) on the necessary infrastructure requirements to support the levels of development proposed within the LDP. In respect of allocation MG2 (20) Dwr Cymru Welsh Water have not raised any objection to the proposals but have submitted the following site specific commentary:

“The Cowbridge area is an area where there is poor water pressure and in order to provide guaranteed water supplies to these allocations a new booster station is required. Our current Asset Management Plan which runs to year 2015 does not include this works. Should potential developers wish to develop this allocation in advance of our planned Regulatory investment, then the Requisition provisions of the Water Industry Act can apply.

Our local sewerage network can accommodate foul flows from the proposed site but off-site sewers are required. These can be provided by a sewer requisition scheme, under Sections 98 – 101 of the Water Industry Act 1991.

Potential developers need to be aware that the site is crossed by a 100mm diameter rising main that runs through the centre of the site. This sewer may restrict the amount of density proposed and protection measures in the form of easement widths or a diversion of the pipe would be required.

In terms of our Waste Water Treatment Works (WWTW), your Authority are advised that the total density proposed for allocations in Cowbridge (which includes Colwinston and Ystradowen) will exceed the theoretical design of our Cowbridge WWTW. Dependent on the pace and scale of development, there will ultimately be a time when increased capacity will be required, which will form part of our Asset Management Plan investment.”

Site specific matters raised by DCWW for which future developers must address as part of any future development proposal is set out in Appendix 5 of the Deposit LDP. In addition, DCWW have prepared a water and sewage infrastructure costs assessment for LDP site allocations and this has been prepared as a submission document. This indicates that a Waste Water Treatment Works improvement scheme has been included within their latest Asset Management Plan (AMP6). Therefore, in light of the comments provided by DCWW, the Council is of the opinion that the necessary infrastructure can be provided to serve the

development.

- **Increased flood risk**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (20) NRW have not raised any objection to the proposals.

- **Loss of biodiversity and ecology**

A general response to this issue is contained in paragraph 3.1.6. In preparing the LDP all sites submitted for consideration have been subject to the Council's Site Assessment Appraisal. This included consultation with Natural Resources Wales (formerly Countryside Council for Wales CCW) who provided advice on sites, alongside closely working with the Council's biodiversity officer to ensure the integration of the Council's SINC study within the LDP process. Additionally, as a statutory consultee NRW have had the opportunity to formally respond to the Deposit LDP, providing additional representations on site specific matters as well as the policy framework of the LDP. From these consultations NRW have submitted the following recommendation

"We are aware of records of Great Crested Newts, bats and dormice being present in the vicinity of these allocations. Proposals for development at these sites will therefore need to ensure there is no likely detriment to the maintenance of the Favourable Conservation Status of these protected species, and comply with the Conservation of Habitats and Species Regulations 2010 (as amended)."

- **Lack of public car parking within Cowbridge and the proposals would increase car use by residents to the town centre**

It is the Council's opinion that the site is reasonably located to the centre of Cowbridge to enable future residents to walk and cycle into the town centre. Additionally, the current parking issues within Cowbridge could be addressed through appropriate parking management measures - presently parking within Cowbridge is not restricted to time or charged for and as such there is currently no incentive to use sustainable transport. Furthermore, the LDP seeks to promote the use of sustainable transport in line with National Planning Policy, and the provision of car parking would therefore be contrary to national and local objectives.

- **Limited public transport provision**

The Council is of the opinion that Cowbridge is well serviced by public transport with service to Bridgend and Cardiff as well as local services within the Vale of Glamorgan itself. This is reflected in the Council's assessment of transport provision detailed in the Sustainable Settlement Appraisal Background Document which identified that Cowbridge was 4th overall in terms of its score for public transport provision (Appendix 5, page 28 refers). Additionally, future development proposals in Cowbridge will also be required to contribute towards the provision and enhancement of public transport services in accordance with policy MD4 Community Infrastructure and Planning Obligations.

- **The proposed bypass would not resolve current traffic congestion problems in Cowbridge**

It is the Council's opinion that the proposed development would significantly alleviate current highway congestion experienced within Cowbridge. One of the main contributors to congestion is heavy vehicles that use Cowbridge to access Llandow Trading and Industrial Estates. The provision of this bypass will give such vehicles a more direct route from the A48 to Llantwit Major Road (B4270). Additionally, the proposed link road

would also provide road safety benefits within Cowbridge and also on the A48 and B4270. Given that it is highly unlikely that funding would be made available to finance the construction of a Llyswoorney Bypass as outlined in the Adopted Vale of Glamorgan LDP, it is the Council opinion that delivery of a link road would significantly improve congestion and road safety issues in and around Cowbridge.

- **Impact on services and facilities-, and specifically public transport provision, increased pressure on existing school provision/and or the school is not required, increased pressure for local services - doctors, dentist etc.**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p62) of the Infrastructure Plan sets out the planning requirements for the site MG2-20 including contributions for improved sustainable transport, a new welsh medium primary school on site, a new play area and built sports facilities.

- **New school is not required**

The Education Facilities Background Paper considers the requirements for educational facilities to address the needs arising from the new housing developments and to meet changing educational needs during the Plan period. Paragraph 5.1 states 'the housing growth expected in the LDP period gives rise to demand for an additional 1045 nursery places (552 full time equivalent), 2906 primary places, and 2,592 secondary school places.' As a result of the analysis set out in Appendix C (Impact of new housing on schools in the Vale) the Council considers that a new primary school at land to the north and west of Darren Close Farm (MG6 (4)) should be provided.

- **Limited employment opportunities**

The site offers the opportunity for future residents to access employment opportunities within the local area and also nearby in Cardiff and Bridgend which is accessible by public transport and the site is considered to be within relatively close commuting distance to potential employment opportunities. However, ultimately where individuals choose to work is a matter of personal choice and outside the control of the LDP. Notwithstanding this the LDP seeks to promote the local economy and local employment opportunities through the provision of a range of local and regional employment sites.

- **Alternative Site boundary considered to be required to ensure delivery of required infrastructure**

A representation in support of the allocation was submitted by Asbri Planning on behalf of Mr J Homfray (representation 117/1). These representations also objected to the LDP site allocation boundary and requested that an amended site boundary be included within the LDP to ensure the delivery of the link road, primary school and the residential development identified in the Deposit LDP (alternative site reference numbers ASA5 and ASA11).

Following further highway feasibility work that has been undertaken by the prospective developer the Council's Highway Engineers. It is considered that it could not be easily located further East as indicated by the Deposit LDP site boundary due the required junction visibility and speed classification of the road. In addition, it is considered that local topography restricts road alignment options for the proposed link road. Therefore, having considered the need for the need for the alternative sites it is proposed that the LDP site allocation boundary for MG2 (20) and the residential settlement boundary be amended to include the proposed location for the link road to ensure deliverability and soundness of the Plan.

Proposed change. Amend the residential settlement boundary for Cowbridge and the site allocation boundary for MG2 (20) to include the proposed link road as shown on the Focused Changes Proposals Map.

Site MG2- 21 Plasnewydd Farm, Llantwit Major		
Representor ID and Name		
ID-41/2/1 ID-125/1/6 ID-799/1/1	ID-2261/1/3 ID-3623/1/1	ID-5337/1/1 ID-5360/1/1
<p>Summary of the Grounds of Objection</p> <ul style="list-style-type: none"> • Representations submitted object to the proposed housing allocation due to its negative impact on the setting of the adjacent Llantwit Major Conservation Area and the potential loss of an archaeological site • Health and safety concerns regarding the adjacent Vale of Glamorgan railway line and the un-gated public crossing • Concerns over increased traffic/ congestion on roads near to the site (particularly narrow roads) • Increase potential flood risk/ drainage issues • No provision to improve the existing footpath • Lack of provision for affordable housing • Village pond on the site could be a health and safety concern due to open water hazard and potential for rodents and rubbish to collect in the area • Noise disturbance and lack of privacy from passing trains • Increased demand on local schools, doctors, dentists etc. • Limited public transport provision 		
<p>Council Response</p> <p>The site is now the subject of an extant planning permission; the areas of objection within the representations have been considered by the Council in its decision to grant permission for development.</p>		

Site MG2- 22 Land adjacent to Llantwit Major Bypass		
Representor ID and Name		
ID-5096/1/29 ID-6107/1/2		
<p>Summary of the Grounds of Objection</p> <ul style="list-style-type: none"> • Have a detrimental impact on existing infrastructure (including schools) • Increase potential flood risk • Potential of Great Crested Newts to be within proximity of the site 		
<p>Council Response</p> <ul style="list-style-type: none"> • Have a detrimental impact on existing infrastructure (including schools) <p>A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p64) of the Infrastructure Plan sets out the planning requirements for the site MG2-22 including contributions for improved sustainable transport, a new welsh medium primary school on site, a library, community building, a new play area and built sports facilities.</p> <ul style="list-style-type: none"> • Increased flood risk 		

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (22) Dwr Cymru Welsh Water have not raised any objection to the proposals but have submitted the following site specific commentary-

"The Llantwit Major area is at the extremity of our water supply network and there are current problems with water supply. Extensive improvements are required and we will include this work in our submission to Ofwat for the next round of funding for the period 2015 – 2020.

Our local sewerage network can accommodate foul flows from the proposed site but off-site sewers are required. These can be provided by a sewer requisition scheme, under Sections 98 – 101 of the Water Industry Act 1991.

Our Llantwit Major Waste Water Treatment Works (WWTW) can accommodate the foul flows from this proposed site."

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Potential of Great Crested Newts to be within proximity of the site**

A general response to this issue is contained in paragraph 3.1.6. In preparing the LDP all sites submitted for consideration have been subject to the Council's Site Assessment Appraisal. This included consultation with Natural Resources Wales (formerly Countryside Council for Wales CCW) who provided advice on sites, alongside closely working with the Council's biodiversity officer to ensure the integration of the Council's SINC study within the LDP process. Additionally, as a statutory consultee NRW have had the opportunity to formally respond to the Deposit LDP, providing additional representations on site specific matters as well as the policy framework of the LDP. In this respect NRW have provided the below site specific comments on site MG2 (22) :

"We are aware of records of Great Crested Newts being present in the vicinity of this allocation. Proposal for development at the site will therefore need to ensure there is no likely detriment to the maintenance of the Favourable Conservation Status of this protected species, and comply with requirements set out in the Conservation of Habitats and Species Regulations 2010 (as amended).

We therefore recommend that comments made in Appendix 5 (Housing Allocations (Policy MG2): Individual Site Details for MG 2 (22)) should be amended to clarify the potential presence of the species and include a requirement that an application for planning permission at this site will require an appropriate ecological survey report to be provided in support of the application (To meet Test of Soundness C2 and CE3)."

From these consultations neither NRW nor the Council's biodiversity officer has raised any concerns regarding the impact of the proposed development on biodiversity or nature conservation matters. However the Council's biodiversity officer and NRW have requested as a matter of precaution that an ecology survey of the site be undertaken prior to the commencement of any development.

Site MG2-23 Land at Upper Cosmeston Farm, Lavernock, Penarth		
Representor ID and Name		
ID-797/1/1	ID-5325/1/1	ID-5794/1/3
ID-1080/1/1	ID-5326/1/1	ID-5820/2/1
ID-1735/1/6	ID-5377/1/1	ID-5838/1/1
ID-1853/2/1	ID-5389/1/1	ID-5840/2/1
ID-2041/1/1	ID-5390/1/1	ID-5842/2/1
ID-2272/1/1	ID-5394/2/1	ID-5846/3/1
ID-2734/2/1	ID-5416/1/1	ID-5848/2/1
ID-2734/2/3	ID-5419/1/3	ID-5849/3/1
ID-3594/1/2	ID-5433/1/1	ID-5849/3/2
ID-3687/1/1	ID-5440/3/1	ID-5850/3/2
ID-3723/1/1	ID-5448/1/1	ID-5872/2/1
ID-3753/1/1	ID-5455/3/1	ID-5882/1/1
ID-3841/1/1	ID-5489/2/1	ID-5887/1/1
ID-3841/1/2	ID-5493/2/1	ID-5889/1/1
ID-3841/1/3	ID-5514/1/1	ID-5891/1/1
ID-3899/2/1	ID-554/2/1	ID-5916/1/1
ID-3899/3/2	ID-5548/1/1	ID-5918/1/1
ID-3970/1/5	ID-5563/2/1	ID-5923/1/1
ID-4057/1/1	ID-5571/1/1	ID-5930/3/1
ID-4099/3/1	ID-5602/3/1	ID-5931/3/1
ID-4101/3/1	ID-5612/1/1	ID-5943/1/1
ID-4102/3/1	ID-5613/1/2	ID-5959/3/1
ID-4157/1/1	ID-5620/1/2	ID-5989/2/1
ID-4158/1/1	ID-5621/3/1	ID-5994/1/1
ID-4798/4/1	ID-5668/3/1	ID-5995/2/3
ID-5123/2/1	ID-5685/2/1	ID-5998/1/1
ID-5140/1/2	ID-5689/4/1	ID-6035/1/1
ID-5157/1/1	ID-5738/1/2	ID-6047/3/1
ID-5159/1/11	ID-5752/1/1	ID-6150/1/1
ID-5159/1/12	ID-5794/1/1	ID-6184/1/5
ID-5160/1/1		
Summary of the Grounds of Objection <ul style="list-style-type: none"> • Questions the need and level of housing in the Penarth area • Development would exacerbate existing traffic congestion problems • Adversely affect an existing viable business • Disproportionate level of housing • Adversely impact on the coastal setting • Insufficient local services and facilities to support additional housing • Poor public transport • Lack of local employment opportunities • Exacerbate existing local flooding • Loss of biodiversity • Disruption caused during construction • Promotes ribbon development and potential coalescence of Sully and Penarth • Housing density proposed is excessive 		
Council Response		

- **Questions the need and level of housing in the Penarth area**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement over the LDP, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of site will assist in providing for the overall housing requirement in the Vale of Glamorgan.

- **Development would exacerbate existing traffic congestion problems**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Adversely affect an existing viable business**

Whilst the tenant farmer has raised objections to MG2 (23) citing the loss of livelihood as a result of the proposal, no substantive evidence has been submitted to support this statement.

- **Disproportionate level of housing**

A general response to this issue is contained in 3.1.9. For Penarth, the Deposit LDP proposes the development of some 380 dwellings on three sites. This represents 5% of the housing allocated under policy MG2, and 33% of the housing allocated across the three Service Centres (Cowbridge, Llantwit Major and Penarth). As the second largest settlement in the Vale of Glamorgan after Barry, offering a wide a range of services and facilities, the Council is of the opinion that on the basis of housing numbers alone, the level of housing proposed for Penarth is appropriate in terms of its role as a Service Centre within the LDP.

- **Adversely impact on the coastal setting**

The Council has allocated the site away from the coastal edge to ensure that the housing allocation will have a limited impact on the coastal setting. Additionally, any future development proposals will be required to take into consideration contextual issues including its impact on the coastal setting. Detailed design will further mitigate any likely adverse impacts of the development on the local surroundings.

- **Insufficient local services and facilities to support additional housing, including doctors, dentists and local schools**

A general response to this issue is contained in paragraph 3.1.3. Penarth is a long established town which offers a range of services and facilities that are easily accessible by a variety of transport modes. This is reflected in the identification of Penarth as a Service Centre Settlement within the LDP settlement hierarchy. Appendix 1 (p65) of the Infrastructure Plan sets out the planning requirements for the site MG2 (23) including contributions for improved sustainable transport, additional school places, a new community building adjoining Upper Cosmeston Farm (Lavernock), improvements to Penarth library, a new play area and built sports facilities.

The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities would be required over the plan period. In Penarth some GP practices are operating at or near full capacity so investment will be needed to manage the increased demand. This may include improvements to the following practices: Stanwell Road Surgery, Redlands Road Surgery, Sully Surgery, Albert Road Surgery and Station Road Surgery.

- **Poor public transport**

The Council is of the opinion that Penarth is well served by public transport with regular bus and train services to Cardiff as well as local services within the Vale of Glamorgan itself. Future development proposals will also be required to contribute towards the provision and enhancement of public transport services in accordance with policy MD4 Community Infrastructure and Planning Obligations.

- **Lack of local employment opportunities**

The site offers the opportunity for future residents to access employment opportunities within the local area and also nearby in Cardiff which is accessible by public transport. However, ultimately where individuals choose to work is a matter of personal choice and outside the control of the LDP. Notwithstanding this the LDP seeks to promote the local economy and local employment opportunities through the provision of a range of local and regional employment sites.

- **Exacerbate existing local flooding**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (23) NRW have not raised any objection to the proposal. In respect of water infrastructure capacity Dwr Cymru Welsh Water have advised that:

'A water supply can be provided to service this proposed site. Our local network is considered suffice for the housing density proposed. No problems are envisaged with the public sewerage system for domestic foul discharge from this proposed development. Our Cog Moors Waste Water Treatment Works (WwTW) has limited capacity and dependent on the pace and build rate of new properties, there will ultimately be a time when increased capacity is required. Our current Asset Management Plan to year 2015 does not include improvements to this WwTW.'

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Loss of biodiversity**

A general response to this issue is contained in paragraph 3.1.6. In preparing the LDP all sites submitted for consideration have been subject to the Council's Site Assessment Appraisal. This included consultation with Natural Resources Wales (formerly Countryside Council for Wales CCW) who provided advice on sites, alongside closely working with the Council's biodiversity officer to ensure the integration of the Council's SINC study within the LDP process. No objections have been raised to the housing allocation in respect of the loss of biodiversity or impact on ecology.

- **Disruption caused during construction**

The Council acknowledges that during the construction stage there would be some disruption caused, however, it is not considered that this would fundamentally or unacceptably impact upon neighbouring properties. It is considered that such impacts are in many cases an unavoidable consequence of a development but can be controlled through planning conditions and through appropriate site management during the construction period.

- **Promotes ribbon development and potential coalescence of Sully and Penarth**

The Council has sought to ensure that further development opportunities between Sully and Penarth are restricted through the allocation of a new Green Wedge – South Penarth to Sully (Policy MG18 (6) refers). Whilst site allocation MG2 (23) has been identified to meet local housing needs its boundaries and the green wedge designation seek to prevent the coalescence of the settlements and additional development as suggested by representors is therefore unlikely.

- **Housing density proposed is excessive**

The Council has calculated the dwelling capacity of the site at 30 dwellings per hectare, which reflects the density of development within the locality and is the standard to be applied to all Service Centre and Primary Settlements identified under Policy MD 7 to ensure the **sustainable use of land**. Accordingly the Council considers the proposed dwelling number identified for the site allocation is appropriate for the area.

Site MG2-24 Land adjoining St. Josephs School, Sully Road

Representor ID and Name

ID-1735/1/1

ID-3789/1/2

ID-5659/1/1

Summary of the Grounds of Objection

- Lack of infrastructure to support proposed development
- Increased flood risk/ issues with water drainage and sewerage
- Loss of residential amenity
- Increase traffic congestion
- Impact on highway safety and parking within the vicinity of the site
- Concerns that the proposal conflicts with the green wedge policy
- Concerns with a decrease in value for properties in the local vicinity of the site
- Poor public transport facilities near to the site
- Loss of biodiversity

Council Response

- **Lack of infrastructure to support proposed development**

A general response to this issue is contained in paragraph 3.1.3. Penarth is a long established town which offers a range of services and facilities that are easily accessible by a variety of transport modes. This is reflected in the identification of the Penarth as a Service Centre Settlement within the LDP settlement hierarchy. Appendix 1 (p66) of the Infrastructure Plan sets out the planning requirements for the site MG2 (24) including contributions for improved sustainable transport, additional school places, improvements to Penarth library, a new play area and built sports facilities.

The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify area where additional medical facilities would be required over the plan period. In Penarth some GP practices are operating at or near full capacity so investment will be needed to manage the increased demand. This may include improvements to the following practices: Stanwell Road Surgery, Redlands Road Surgery, Sully Surgery, Albert Road Surgery and Station Road Surgery.

- **Increased flood risk/ issues with water drainage and sewerage**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (24) NRW have not raised any objection to the proposal. In respect of water infrastructure capacity Dwr Cymru Welsh Water have advised that:

“A water supply can be provided to service this proposed site. Our local network is considered suffice for the housing density proposed. No problems are envisaged with the public sewerage system for domestic foul discharge from this proposed development. Potential developers need to be aware that the site is crossed by 150mm diameter public sewer at the north western edge. This sewer may restrict the amount of density proposed and a protection measure in the form of easement width or diversion of the pipe is required.

Our Cog Moors Waste Water Treatment Works (WwTW) has limited capacity and dependent on the pace and build rate of new properties, there will ultimately be a time when increased capacity is required. Our current Asset management Plan to year 2015 does not include improvements to this WwTW.”

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Loss of residential amenity**

Future development of the site would be required to ensure that the residential amenity of existing residents is protected in accordance with LDP Policies MD2 (Place Making) Criterion 7 and MD 3 (Design of New Development) Criterion 2 and 4.

- **Increase traffic congestion**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Impact on highway safety and parking within the vicinity of the site**

Future development of the site would be required to ensure that the development proposal would ensure that safe highway access and appropriate parking provision is provided in accordance with LDP policy MD2 criteria 5. Elsewhere problems associated with on street parking outside of the development site is a matter for

highway management and enforcement, however these matters may be considered as part of any future development of the site.

- **Concerns that the proposal conflicts with the green wedge policy**

Green wedge boundaries were originally defined by the Council for the purpose of managing development during the UDP lifetime, and the permanence of these designations are limited to the lifetime of a statutory plan and will always be subject to potential change. In allocating housing site MG2 (24) the Council has amended the green wedge boundary to accommodate the housing allocation however the overall objective of the amended green wedge remains.

- **Concerns with a decrease in value for properties in the local vicinity of the site**

The perceived impact of new development on existing local property prices is not a planning issue and therefore not a matter for the LDP.

- **Poor public transport facilities near to the site**

The Council shall ensure future contributions to sustainable transport are made when considering development planning proposals in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations and set out in the Draft Infrastructure Plan, Appendix 1 p.66.

- **Loss of biodiversity**

A general response to this issue is contained in 3.1.6. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with nature conservation impacts. In respect of allocation MG2 (24) NRW have not raised any objection to the proposal.

Site MG2-25 Headlands School, St. Augustine's Road - Delete Site

Representor ID and Name

ID-3753/1/2	ID-4753/1/1	ID-4762/1/1
ID-4750/1/1	ID-4757/1/1	ID-5971/1/1

Summary of the Grounds of Objection

- Lack of infrastructure to support proposed development including local schools and health facilities.
- Loss of residential amenity and recreational land
- Increase traffic congestion
- Impact on highway safety and parking
- Loss of greenfield land (and trees with Tree Preservation Orders (TPOs))
- Concerns expressed with housing being located too close to the cliff edge/ the stability of the cliff edge and long term erosion damaging the coastline causing slippages posing a risk to houses on the site.
- Issues with an increase in vehicle parking on nearby/ neighbouring roads due to the close proximity of schools to the site leaving a lack of parking spaces available for present residents

Council Response

- Lack of infrastructure to support proposed development including local schools and health facilities.

A general response to this issue is contained in paragraph 3.1.3. Penarth is a long established town which offers a range of services and facilities that are easily accessible by a variety of transport modes. This is reflected in the identification of the Penarth as a Service Centre Settlement within the LDP settlement hierarchy. Appendix 1 (p67) of the Infrastructure Plan sets out the planning requirements for the site MG2 (25) including contributions for improved sustainable transport, additional school places, enhancement to local community buildings, improvements to outdoor sports space, improvements to Penarth library, a new play area and built sports facilities.

The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify area where additional medical facilities would be required over the plan period. In Penarth some GP practices are operating at or near full capacity so investment will be needed to manage the increased demand. This may include improvements to the following practices: Stanwell Road Surgery, Redlands Road Surgery, Sully Surgery, Albert Road Surgery and Station Road Surgery.

- **Loss of residential amenity and recreational land**

Future development of the site would be required to ensure that the residential amenity of existing residents is protected in accordance with LDP policy MD2 criteria 7.

- **Increase traffic congestion**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Impact on highway safety and parking**

Future development of the site would be required to ensure that the development proposal would ensure that safe highway access and appropriate parking provision is provided in accordance with LDP policy MD2 criteria 5. Elsewhere problems associated with on street parking outside of the development site is a matter for highway management and enforcement, however these matters may be considered as part of any future development of the site.

- **Loss of greenfield land (and trees with TPO's)**

A general response to this issue is contained in 3.1.5. In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has worked closely with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites.

MG 2 (25) is a brownfield site and constitutes 'Previously Developed Land'. Previously Developed Land is defined in Planning Policy Wales; Figure 3 as being:

'That which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage (see note 1 below) of the development is included, as are defence buildings, and land used for mineral extraction and waste disposal (see note 2 below) where provision for restoration has not been made through development management procedures.'

Welsh Government has stated with regard to the land that it is 'non-agricultural land and therefore does not constitute BMV land'

The Council is aware that there are a number of mature trees on the site covered by a tree preservation order and that any proposals on the site will be expected to incorporate the preservation of these trees within the design of the scheme.

- **Concerns expressed with housing being located too close to the cliff edge/ the stability of the cliff edge and long term erosion damaging the coastline causing slippages posing a risk to houses on the site.**

The site layout and design for a proposal on the site will need to take into consideration the necessary precautions to ensure properties are not located dangerously close to the cliff edge and there is no health and safety threat. No objection has been raised by the Council's Visible Services Department, specifically (Shoreline Management Plan SMP 2).

- **Issues with an increase in vehicle parking on nearby/neighbouring roads due to the close proximity of schools to the site leaving a lack of parking spaces available for present residents**

Future development of the site would be required to ensure that the development proposal would ensure that safe highway access and appropriate parking provision is provided in accordance with LDP policy MD2 criterion 5. Elsewhere problems associated with on street parking outside of the development site is a matter for highway management and enforcement- however these matters may be considered as part of any future development of the site.

Site MG2-26 Land at and adjoining St. Cyres School, Murch Road

Representor ID and Name

ID-1735/1/2	ID-4752/2/1	ID-5594/1/1
ID-1818/1/1	ID-4779/1/1	ID-5623/1/1
ID-2036/4/8	ID-4817/1/1	ID-5659/1/2
ID-3467/1/1	ID-4825/1/1	ID-5748/1/1
ID-3532/2/1	ID-4870/1/1	ID-5769/1/1
ID-3661/3/1	ID-4884/2/1	ID-5821/1/1
ID-3774/1/1	ID-4957/1/1	ID-5825/1/1
ID-3938/1/1	ID-4979/1/4	ID-5844/1/1
ID-3944/1/1	ID-4981/1/1	ID-5884/1/2
ID-3963/1/4	ID-5096/1/30	ID-5885/1/1
ID-4021/1/1	ID-5159/1/1	ID-5886/1/1
ID-4118/1/1	ID-5159/1/13	ID-5893/1/1
ID-4155/1/1	ID-5313/1/1	ID-6026/1/1
ID-4159/1/2	ID-5313/1/3	ID-6051/1/1
ID-4232/1/1	ID-5313/2/1	ID-6055/1/1
ID-4673/1/19	ID-5494/1/1	ID-6057/1/1
ID-4692/1/1	ID-5568/1/1	ID-6088/2/1

ID-4696/1/1	ID-5593/1/1	ID-6203/1/3
<p><i>Summary of the Grounds of Objection</i></p> <ul style="list-style-type: none"> • Lack of infrastructure to support proposed development • Loss of residential amenity • Increase traffic congestion • Poor public transport provision • Additional public transport to access proposed medical centre • Loss of Green Wedge land • Intrusion into open countryside • Increased flood risk • Impact on highway safety 		
<p><i>Council Response</i></p> <ul style="list-style-type: none"> • Lack of infrastructure to support proposed development <p>A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p68) of the Infrastructure Plan sets out the planning requirements for the site MG2-26 including contributions for improved sustainable transport, additional school places, provision of new community building, provision of outdoor sports space, improvements to Dinas Powys library, a new play area and built sports facilities.</p> <p>The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify area where additional medical facilities would be required over the Plan period, however nothing has been specifically identified for the Dinas Powys area.</p> <ul style="list-style-type: none"> • Loss of residential amenity <p>Future development of the site would be required to ensure that the residential amenity of existing residents is protected in accordance with LDP policy MD2 criteria 7.</p> <ul style="list-style-type: none"> • Increase traffic congestion <p>A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.</p> <ul style="list-style-type: none"> • Poor public transport provision <p>The Council shall ensure future contributions to sustainable transport are made when considering development planning proposals in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations and Appendix 1 (p68) of the Infrastructure Plan.</p> <ul style="list-style-type: none"> • Additional public transport to access proposed medical centre 		

There are presently no plans to provide a bus service to the medical centre, however any future housing proposals would be required to contribute towards the provision of sustainable transport (as stated above), and could include the extension/diversion of existing bus services to serve the housing development and the medical centre. Consideration is also being given to using the Council's Greenlinks Service.

- **Loss of Green Wedge land**

In preparing the Deposit LDP, the green wedges designated in the most recently adopted plan (the Unitary Development Plan) were reviewed. It was considered that due to the projected growth for the area, there would need for amendments to be made to the boundaries of the green wedges designated in the UDP to accommodate the new development needed to provide for the estimated growth over the LDP period. A green wedge designation is less permanent than a green belt and allows for more focused control of development to protect from the coalescence of settlements and the preservation of open space. Further information on this can be found in the Green Wedge LDP Background Paper.

- **Intrusion into open countryside**

The site adjoins existing residential development of Dinas Powys and it is considered to provide a logical extension to the settlement.

- **Increased flood risk**

A general response to this issue is contained in 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (26) NRW have advised the following:

'Any future planning application will be required to assess surface water requirements with appropriate consideration of sustainable drainage systems. Natural Resources Wales should be consulted on proposals to ensure and agree the proposed runoff rates into the Eastbrook and Sully Brook (Main Rivers) and in order to ensure no increase in the risk of flooding in these catchments'.

In respect of water infrastructure capacity for site allocation MG 2 (26), Dwr Cymru Welsh Water have advised that:

A water supply can be provided to service this proposed site, but this will require the provision of off-site mains to be laid to the boundary of the site. These can be provided by a water requisition scheme, under Sections 41 – 44 of the Water Industry Act 1991. Our local sewer network is too small to accommodate the foul flows from this development. A hydraulic modelling assessment will be required to establish the point of connection to the public sewer system and / or any improvement work required. Our Cog Moors Waste Water Treatment Works has limited capacity and dependent on the pace and build rate of new properties, there will ultimately be a time when increased capacity is required. Our current Asset management Plan to year 2015 does not include improvements to this WwTW.'

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Impact on highway safety**

Future development of the site would be required to ensure that the development proposal would ensure that

safe highway access and appropriate parking provision is provided in accordance with LDP policy MD2 criterion 5. Elsewhere problems associated with on street parking outside of the development site is a matter for highway management and enforcement- however these matters may be considered as part of any future development of the site.

Site MG2-27 Land off Caerleon Road, Dinas Powys

Representor ID and Name

ID-1735/1/3	ID-4752/3/1	ID-5623/1/2
ID-1818/1/2	ID-4779/1/2	ID-5659/1/3
ID-3963/1/3	ID-4825/2/1	ID-5821/2/1
ID-4021/1/2	ID-4957/1/2	ID-5825/2/1
ID-4159/1/3	ID-4979/1/2	ID-5886/1/2
ID-4232/1/2	ID-5159/1/2	ID-5893/1/2
ID-4692/1/2	ID-5159/1/8	ID-6026/1/2
ID-4694/2/1	ID-5594/1/3	ID-6203/1/1
ID-4696/1/2		

Summary of the Grounds of Objection

- Lack of infrastructure to support proposed development
- Loss of residential amenity
- Increase traffic congestion
- Poor public transport provision
- Loss of Green Wedge land
- Intrusion into open countryside
- Increased flood risk
- Issues with drainage and a lack of a watercourse available to discharge surface water (ID:5659/1/3)
- Impact on highway safety
- Suggestion for an alternative use of the site as a train park and ride facility to alleviate congestion at Merrie Harrier Junction; ASN 99 (ID:5159/1/8)

Council Response

• **Lack of infrastructure to support proposed development**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p69) of the Infrastructure Plan sets out the planning requirements for the site MG2-27 including contributions for improved sustainable transport, additional school places, improvements to Dinas Powys library, a new play area and built sports facilities.

The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify area where additional medical facilities would be required over the Plan period, however nothing has been specifically identified for the Dinas Powys area.

• **Loss of residential amenity**

Future development of the site would be required to ensure that the residential amenity of existing residents is protected in accordance with LDP policy MD2 criterion 7.

- **Increase traffic congestion**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Poor public transport provision**

The Council shall ensure future contributions to sustainable transport are made when considering development planning proposals in accordance with LDP policy MD4 Community Infrastructure and Planning Obligations.

- **Loss of Green Wedge land**

In preparing the Deposit LDP, the green wedges designated in the most recently adopted plan (the Unitary Development Plan) were reviewed. It was considered that due to the projected growth for the area, amendments would need to be made to the boundaries of the green wedges designated in the UDP to accommodate the new development needed to provide for the estimated growth over the LDP period. A green wedge designation is less permanent than a green belt and allows for more focused control of development to protect from the coalescence of settlements and the preservation of open space. Further information on this can be found in the Green Wedge LDP Background Paper.

- **Intrusion into open countryside**

The site adjoins the existing residential development of Dinas Powys and it is therefore considered to provide a logical extension to that settlement.

- **Increased flood risk**

A general response to this issue is contained in 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (27) NRW have not raised any objection to the proposals.

- **Issues with drainage and a lack of a watercourse available to discharge surface water (ID:5659/1/3)**

In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (27) NRW have not raised any objection to the proposals.

In respect of water infrastructure capacity for site allocation MG 2 (27), Dwr Cymru Welsh Water (DCWW) have advised that:

'A water supply can be provided to service this proposed site, but this will require the provision of off-site mains to be laid to the boundary of the site. These can be provided by a water requisition scheme, under

Sections 41 – 44 of the Water Industry Act 1991.

No problems are envisaged with the public sewerage system for domestic foul discharge from this proposed development. Potential developers need to be aware that the site is crossed by 1450mm diameter public sewer at the western edge. This sewer may restrict the amount of density proposed and a protection measure in the form of easement width of the pipe is required. Our Cog Moors Waste Water Treatment Works has limited capacity and dependent on the pace and build rate of new properties, there will ultimately be a time when increased capacity is required. Our current Asset management Plan to year 2015 does not include improvements to this Waste Water Treatment Works.'

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Impact on highway safety**

Future development of the site would be required to ensure that the development proposal would ensure that safe highway access and appropriate parking provision is provided in accordance with LDP Policy MD2 criteria 5. Elsewhere problems associated with on street parking outside of the development site is a matter for highway management and enforcement - however these matters may be considered as part of any future development of the site.

- **Suggestion for an alternative use of the site as a train park and ride facility to alleviate congestion at Merrie Harrier Junction; ASN 99 (ID:5159/1/8)**

See Council's response to alternative site submissions.

Site MG2-28 Land at adjoining Ardwyn, Pen-y-Turnpike

Representor ID and Name

ID-1735/1/4	ID-4779/1/3	ID-5659/1/4
ID-1818/1/3	ID-4979/1/3	ID-5886/1/3
ID-3532/1/1	ID-5159/1/3	ID-5893/1/3
ID-3963/1/2	ID-5331/1/1	ID-6129/1/3
ID-4021/1/3	ID-5594/1/4	ID-6155/1/1
ID-4232/1/3	ID-5623/1/3	ID-6198/1/1
ID-4692/1/3		

Summary of the Grounds of Objection

- Lack of infrastructure to support proposed development
- Challenge the housing requirement of the LDP as being too high
- Increase traffic congestion
- Poor public transport provision
- Loss of Green Wedge land
- Intrusion into open countryside
- Increased flood risk/ issues with sewerage capacity/ drainage issues
- Impact on highway safety
- Concerns over development of the site leading to future development plans allocating 'infilling' development in the surrounding area
- Ancient woodland with tree preservation orders should be preserved on the site

- Small population of bats near to the site
- Maintain use of a pathway to gain access to Pen-y- Turnpike Road

Council Response

The site now benefits from an extant planning consent (2014/00167/FUL) refers, all of the issues raised by the objectors have therefore been considered as a part of the determination of the planning application.

- **Lack of infrastructure to support proposed development**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p70) of the Infrastructure Plan sets out the planning requirements for the site MG2-28 including contributions for improved sustainable transport, additional school places, improvements to Dinas Powys library, a new play area and built sports facilities.

The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify area where additional medical facilities would be required over the plan period, however nothing has been specifically identified for the Dinas Powys area.

- **Challenge the housing requirement of the LDP as being too high**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement over the LDP, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of site MG2 (28) will assist in providing for the overall housing requirement in the Vale of Glamorgan.

- **Increase traffic congestion**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Poor public transport provision**

The Council shall ensure future contributions to sustainable transport are made when considering development planning proposals in accordance with LDP Policy MD4 Community Infrastructure and Planning Obligations and Appendix 1 (p70) of the Infrastructure Plan.

- **Loss of Green Wedge land**

In preparing the Deposit LDP, the green wedges designated in the most recently adopted plan (the Unitary Development Plan) were reviewed. It was considered that due to the projected growth for the area, there would need to be amendments made to the boundaries of the green wedges designated in the UDP to accommodate the new development needed to provide for the estimated growth over the LDP period. A green

wedge designation is less permanent than a green belt and allows for more focused control of development to protect from the coalescence of settlements and the preservation of open space. Further information on this can be found in the Green Wedge LDP Background Paper.

- **Intrusion in to open countryside**

The site adjoins existing residential development of Dinas Powys and it is considered to provide a logical extension to the settlement.

- **Increased flood risk/ issues with sewerage capacity/ drainage issues**

In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (28) NRW have not raised any objection to the proposals.

In respect of water infrastructure capacity for site allocation MG 2 (28), Dwr Cymru Welsh Water (DCWW) have advised that:

"A water supply can be provided to service this proposed site. Our local network is considered suffice for the housing density proposed. No problems are envisaged with the public sewerage system for domestic foul discharge from this proposed development. Our Cog Moors Waste Water Treatment Works has limited capacity and dependent on the pace and build rate of new properties, there will ultimately be a time when increased capacity is required. Our current Asset management Plan to year 2015 does not include improvements to this Waste Water Treatment Works."

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Impact on highway safety**

Any future development of the site would be required to ensure adequate and safe highway access is provided for all users, and is designed to meet the Council's highway design criteria and in accordance with LDP policies MD2 Place Making and MD3 Design of Development.

- **Concerns over development of the site leading to future development plans allocating 'infilling' development in the surrounding area**

Alongside the housing allocations identified within the Deposit LDP, proposals for "windfall" housing sites will be considered in accordance with the Managing Development policy framework of the Deposit LDP.

- **Ancient woodland with tree preservation orders should be preserved on the site**

There is no ancient woodland present on the site. The site is subject to a number of Tree Preservation Orders and is adjacent to a broadleaved SINC designation, accordingly any important trees present on the site would be retained as part of any future development proposal, as would consideration of any potential impacts on the nearby SINC in accordance with policy MD10 Promoting Biodiversity.

- **Small population of bats near to the site**

Natural Resources Wales have not raised any concerns in respect of areas of nature conservation associated

with housing allocation MG2 (28). However, a bat survey may be required given the presence of existing buildings on the site. Further consideration of this matter would be taken at the formal planning application stage.

- **Maintain use of a pathway to gain access to Pen-y-Turnpike Road**

Further consideration of pedestrian access would be taken at the formal planning application stage.

Site MG2-29 Land at Cross Common Road

Representor ID and Name

ID-1735/1/5	ID-4884/2/2	ID-5886/1/4
ID-1818/1/4	ID-4979/1/1	ID-5893/1/4
ID-3963/1/1	ID-5159/1/4	ID-5975/1/3
ID-4021/1/4	ID-5594/1/2	ID-6060/1/1
ID-4232/1/4	ID-5623/1/4	ID-6060/2/1
ID-4692/1/4	ID-5659/1/5	ID-6088/2/2
ID-4779/1/4	ID-5776/1/1	ID-6203/1/4

Summary of the Grounds of Objection

- Lack of infrastructure to support proposed development
- Increase traffic congestion
- Poor public transport provision
- Loss of Green Wedge land
- Intrusion into open countryside
- Increased flood risk
- Impact on highway safety
- Issues with drainage and sewerage capacity
- Reduce area of allocation to safeguard protected species
- Available supply of brownfield land as alternative to greenfield land
- Issues with pollution
- Ancient woodland adjacent to the site would suffer from increased recreational use as a result of developing this site.

Council Response

- **Lack of infrastructure to support proposed development**

A general response to this issue is contained in paragraph 3.1.3. Appendix 1 (p71) of the Infrastructure Plan sets out the planning requirements for the site MG2-29 including contributions for improved sustainable transport, additional school places, improvements to Dinas Powys library, a new play area and built sports facilities.

The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify area where additional medical facilities would be required over the plan period, however nothing has been specifically identified for the Dinas Powys area.

- **Increased traffic congestion**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Poor public transport provision**

The Council will seek to ensure that future contributions to sustainable transport are made when considering development planning proposals in accordance with LDP Policy MD4 Community Infrastructure and Planning Obligations and Appendix 1 (p71) of the Infrastructure Plan.

- **Loss of Green Wedge land**

In preparing the Deposit LDP, the green wedges designated in the most recently adopted plan (the Unitary Development Plan) were reviewed. It was considered that due to the projected growth for the area, there would need to be amendments made to the boundaries of the green wedges designated in the UDP to accommodate the new development needed to provide for the estimated growth over the LDP period. A green wedge designation is less permanent than a green belt and allows for more focused control of development to protect from the coalescence of settlements and the preservation of open space. Further information on this can be found in the Green Wedge LDP Background Paper.

- **Intrusion into open countryside**

The site adjoins existing residential development of Llandough and is considered to provide a logical extension to the settlement.

- **Increased flood risk**

In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (29) NRW have not raised any objection to the proposals.

- **Impact on highway safety**

Any future development of the site would be required to ensure adequate and safe highway access is provided for all users, and is designed to meet the Council's highway design criteria and in accordance with LDP Policies MD2- Place Making and MD3 Design of Development.

- **Reduce area of allocation to safeguard protected species (ID-6060/2/1)**

In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with nature conservation. In respect of allocation MG2 (29) NRW have not raised any objection to the proposals.

- **Issues with drainage and sewerage capacity**

In respect of water infrastructure capacity for site allocation MG 2 (29), Dwr Cymru Welsh Water have advised that:

"A water supply can be provided to service this proposed site. Our local network is considered suffice for the housing density proposed. No problems are envisaged with the public sewerage system for domestic foul discharge from this proposed development. Potential developers need to be aware that the site is crossed by 150mm diameter public sewer at the northern edge. This sewer may restrict the amount of density proposed and a protection measure in the form of easement width or diversion of the pipe is required. Our Cog Moors Waste Water Treatment Works has limited capacity and dependent on the pace and build rate of new properties, there will ultimately be a time when increased capacity is required. Our current Asset management Plan to year 2015 does not include improvements to this Waste Water Treatment Works."

In light of the comments provided by DCWW, the Council is of the opinion that the necessary infrastructure can be provided to serve the development.

- **Issues with pollution**

A general response to this issue is contained in paragraph 3.1.2. In preparing the LDP the Council has consulted with Natural Resource Wales who have not raised any concerns regarding potential increase in noise and air pollution generated by the proposed housing allocations. In addition no concerns have been raised by the Council's Environmental Health department on this issue.

- **Ancient woodland adjacent to the site would suffer from increased recreational use as a result of developing this site.**

Natural Resources Wales have not raised any concerns regarding the impact of the proposed development on neighbouring areas of ancient woodland however any such constraint would form a consideration as a part of a future planning application.

Site MG2-30 Land south of Llandough Hill / Penarth Road		
Representor ID and Name		
ID-2036/4/9 ID-2256/1/1	ID-6158/1/2	ID-6158/2/1
Summary of the Grounds of Objection <ul style="list-style-type: none"> • Deliverability of the site is questioned • Loss of trees • Inappropriate over development • Increased traffic congestion • Impact on local schools 		
Council Response <ul style="list-style-type: none"> • Deliverability of the site is questioned <p>The Council is not aware of any site constraints that would prevent the deliverability of the site within the LDP plan period.</p>		

- **Loss of trees**

The Council would require any important trees present on the site to be retained as part of any future development proposal in accordance with policy MD10 Promoting Biodiversity.

- **Inappropriate over development**

The Deposit LDP identifies the site allocation at a density of 25 dwellings per hectare which is below the target density of 30 dwellings per hectare required under Policy MD7 (Housing Densities). Site constraints are listed at Appendix 5 of the LDP and have been taken into consideration in allocation of sites. It is therefore considered that the level of housing proposed is appropriate to the site and its locality.

- **Increased traffic congestion**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Impact on local schools**

Alongside the production of the LDP, the Council has produced its Draft Infrastructure Plan and is supported by a series of associated background papers. This identifies the necessary infrastructure requirements to support the proposed level housing growth within the LDP, and assesses the infrastructure requirements for each housing allocation within the LDP to enable the Council to seek contributions towards new or enhanced provision. In respect of the impact of other LDP site allocations in addition to site MG2 (30) the Infrastructure Plan identifies that this would not generate additional demand for pupil places above the existing capacity of schools within the catchment area of the site. Appendix 1 of the Infrastructure Plan indicates where contributions towards school places and other community facilities would be required.

Site MG2-31 Land north of Leckwith Road
Representor ID and Name
ID-2256/1/2
<i>Summary of the Grounds of Objection</i>
<ul style="list-style-type: none"> • Loss of green Wedge Land • Increased traffic congestion • Development extending beyond the boundary of existing communities
<i>Council Response</i>
<ul style="list-style-type: none"> • Loss of green wedge land <p>Green wedge boundaries were originally defined by the Council for the purpose of managing development during the UDP lifetime, and the permanence of these designations are limited to the lifetime of a statutory plan and will always be subject to potential change. In allocating new areas for housing, the Council has redrawn green wedge boundaries to follow the boundary of these housing allocations.</p>

- **Increased traffic congestion**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Development extending beyond the boundary of existing communities**

The site adjoins existing residential development of Llandough and is considered to provide a logical extension to the settlement.

Site MG2- 32 Llandough Landings

Representor ID and Name

ID-2036/4/10	ID-5096/1/31	ID-5853/1/1
ID-3753/1/3	ID-5851/1/1	ID-5854/1/1
ID-4679/1/45	ID-5852/1/1	

Summary of the Grounds of Objection

- Increased traffic on existing highway
- Loss of biodiversity and ecology
- Lack of nearby local facilities and services
- Unrelated to any existing residential areas
- Adjoins and partly compromises operational railway land and is extensively covered with trees and scrub.
- NRW state the part of the site is located in a C1 Flood Zone and is susceptible to flood risk
- Issues with the access to the site being dangerous
- Invasion of privacy due to large vehicles being able to see into neighbouring gardens and houses
- Suggestion that the site is a protected nature reserve (ID: 5852/1/1)

Council Response

- **Increased traffic on existing highway**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Loss of biodiversity and ecology**

A general response to this issue is contained in paragraph 3.1.6. In preparing the Deposit LDP the Council

consulted with Natural Resources Wales as well as its own ecologist in order to identify any potential impacts on ecology of the site. In respect of allocation MG2 (32), NRW have not raised an objection to the proposal in respect of the impact on nature conservation interests.

- **Lack of nearby local facilities and services**

The housing allocation is located on the edge of Penarth Marina and is in close proximity to existing services and families, and is well served by regular bus and rail services.

- **Unrelated to any existing residential areas**

The site adjoins existing residential development at Penarth Marina and would provide a logical extension to the marina development, complementary to adjacent developments.

- **NRW state the part of the site is located in a C1 Flood Zone and is susceptible to flood risk**

In support of the candidate site submission, the site proposer has undertaken a Flood Consequence Assessment (FCA) which indicates that the risk of flooding can be appropriately managed. Additionally, any future development proposal would need to undertake further flood risk assessments in support of a future planning application and the Council would consult with NRW as a statutory consultee on the suitability of any flood mitigation and management proposals.

- **Issues with the access to the site being dangerous**

Any future development of the site would be required to ensure adequate and safe highway access is provided for all users, and is designed to meet the Council's highway design criteria.

- **Invasion of privacy due to large vehicles being able to see into neighbouring gardens and houses**

Development proposals will need to consider privacy issues in line with LDP Policies MD 2 (Place Making) and MD3 (Design of New Development). It is considered there is sufficient scope for this issue to be addressed on this site through the appropriate layout and design of future residential proposals.

Site MG2-33 Land north of the Railway Line, Rhose

Representor ID and Name

ID-5096/1/32	ID-5955/1/1	ID-6236/10/1
ID-5096/1/33	ID-6079/2/1	ID-6236/6/1
ID-5954/1/1	ID-6184/1/6	ID-6236/9/1

Summary of the Grounds of Objection

- That any land required for the proposed school should be deducted in its entirety from the open space requirement on site (ID-2826/10/1)
- Amend the site boundary to reflect the actual land ownership (ID-2826/6/1)
- NRW require adequate surface water run-off arrangements to be implemented as part of any development proposals (ID-5096/1/31)
- NRW have raised awareness to the presence of Great Crested Newts in the vicinity of the allocation
- Site is prone to flooding and there are drainage issues on and near to the site
- Proposed educational provision on the site north of the railway line is not required and any educational need would be best accommodated on the existing Rhws primary school site.

<p>(ID:6079/2/1)</p> <ul style="list-style-type: none"> Believes the site had been mis-graded in terms of its current use and ought to be categorised as Category A, arable land as much of it has been used to grow crops, and not merely graze animals, for much of the past five plus years. (ID:6184/1/6)
<p>Council Response</p> <p>The site is the subject of an extant planning consent; the areas of objection within the representations have been previously considered by the Council in its decision to grant permission for the development (application reference 2010/00686/EAO).</p>

Site MG2-34 Land south of the Railway Line, Rhoose		
Representor ID and Name		
ID-6184/1/7		
<p>Summary of the Grounds of Objection</p> <ul style="list-style-type: none"> Objection to loss of land previously allocated within the UDP for employment purposes (ID-6184/1/7) Issues with the proposed density on the site being unsuitable Concerns raised with the ability of drainage infrastructure struggling to cope with additional demand Concerns raised with the suitability of the site due to an Article 14 Stop Notice, which was issued in October 2009 but subsequently withdrawn in November 2009, and a belated screening direction that an Environmental Impact Assessment (EIA) was not required 		
<p>Council Response</p> <p>The Council's initial Employment Land and Premises Study (2007) indicated that due to its location and poor access and proximity/relationship to the surrounding Rhoose Point residential development the site was unsuitable for employment uses and would unlikely to be developed for such uses. It should also be noted that the site is the subject of a full planning permission for residential development (application reference 2012/00937/FUL).</p>		

Site MG2-35 Land to the west of Port Road, Wenvoe		
Representor ID and Name		
ID-80/1/3	ID-2568/2/1	ID-5815/3/8
ID-125/1/1	ID-4908/3/1	ID-6184/1/8
<p>Summary of the Grounds of Objection</p> <ul style="list-style-type: none"> Increase the site capacity to 140 dwellings (ID-2568/2/1) Allocate site as part of a Green Belt (ID-80/1/3) The 140 homes allocated is not proportionate to the size and character of the village (ID:125/1/1) Increased traffic congestion Loss of greenfield land (ID:125/1/1) Difficult for local facilities (including a playgroup and primary school) struggling to cope with an increase in population (ID:125/1/1) Loss of ecology and biodiversity (ID:125/1/1) Unreliable bus service Lack of village facilities available including employment, school, leisure and health facilities Sustainability appraisal and assessments are incorrect in their description of the facilities and 		

<p>services currently available within the village. (ID:4908/3/1)</p> <ul style="list-style-type: none"> • Sustainability appraisal incorrectly bases its conclusions on lower quality 3b agricultural land where the land is actually 3a agricultural land. • Suggestion of new settlement at Llandow as an alternative site
<p>Council Response</p> <p>The site is the subject of an extant planning permission for 132 units (Application reference 2013/00884/OUT and 2014/00452/RES).</p>

Site MG2-36 Land adjoining Court Close, Aberthin		
Representor ID and Name		
ID-1479/1/1	ID-3740/1/1	ID-5015/1/1
ID-2143/1/1	ID-3856/1/1	ID-5815/3/9
ID-3596/4/2	ID-4084/1/1	ID-5815/4/4
ID-3601/1/1	ID-4098/1/1	ID-6174/3/2
<p>Summary of the Grounds of Objection</p> <ul style="list-style-type: none"> • The Council has over estimated its housing requirements – the population projections are incorrect and should be based on latest census data • There is no evidence of affordable housing needed within the village • Support for a new settlement at Llandow • Few local facilities and services • Facilities at capacity including local schools and GPs • Highway safety would be prejudiced • Limited public transport provision • Inappropriate over development • Negative impact on the setting of the village, conservation area and the setting of listed buildings • Increase in the risk of flooding and drainage issues/ surface water run-off onto neighbouring land • Promote alternative sites (ID-4084/1/1) • It would be necessary to exclude parts of the site from development for archaeological reasons (ID:1479/1/1) • Loss of land which could potentially be used for agriculture/ horticulture (ID:1479/1/1) • Request for an 'eco-survey' to be undertaken due to biodiversity value on the site, (ID:1479/1/1) • Site MG2 [36] was not shown as one of the Candidate Sites for inclusion in the LDP either in the original list or in one of the three subsequent addenda. This site appears to have been hastily added at the last minute (ID:2143/1/1). • Moving housing allocations from areas of greatest identified need (South East Zone) to areas of little identified need (minor rural settlements) (ID:3596/4/2). 		
<p>Council Response</p> <ul style="list-style-type: none"> • The Council has over estimated its housing requirements – the population projections are incorrect and should be based on latest census data <p>Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement over the LDP period. Further information is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the Deposit LDP has made adequate provision to meet the identified housing requirement over the plan period and the</p>		

development of this site MG2 (36) will assist in providing for the overall housing requirement in the Vale of Glamorgan.

- **There is no evidence of affordable housing needed within the village**

The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan. This indicates that within the rural housing market areas there is an affordable housing requirement of 35 dwellings per annum. The LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 2015.

This indicates that within the Cowbridge and Llanblethian Ward (which includes Aberthin) an overall annual requirement for 22 affordable dwellings. The study also reveals that there were 43 households living in unsuitable affordable housing (Table 6.3). Additionally, the study highlighted that 117 households stated that a member of their household had left the community due to a shortage of suitable housing locally (Table 7.9). Additionally, Appendix A 5 of the RHNA seeks to identify the overall anticipated housing requirement across all tenures (market and affordable housing) between 2010-2030, this projected a requirement for within the rural Vale for some 3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Consequently, the Council is of the opinion that there is sufficient evidence to justify a requirement for the provision of housing growth within the rural Vale, and whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (36) will contribute to the identified housing need at ward level and reduce the need for existing residents to address their housing requirements elsewhere.

- **Support for a new settlement at Llandow**

Through the candidate sites submissions stage, the Council received some 420 sites for consideration for development, the majority of which were located in rural locations on greenfield land or adjoining the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the grounds that it would be contrary to the overarching LDP strategy. Further details on this are set out in the Council's Revised Options Appraisal Background Paper .

- **Few local facilities and services**

The Council has undertaken an audit of the services and facilities within each settlement and ranked settlements according to the level of services available within each against the key sustainability measures. Further details on the methodology and findings are set out in the Council's Sustainable Settlements Appraisal Background Paper (2013). The appraisal informed the identified hierarchy of urban and rural settlements reflecting the level of services available within each and considering the role and function of settlements in relation to other settlements. Within the hierarchy, Aberthin is categorised as being a Minor Rural Settlement alongside 23 other rural villages within this category reflective of the type and range of services and facilities. Within this category there is a broad spectrum of rural settlements, in terms of size and resident population. However, the residential site allocations within the LDP, such as the site at Aberthin, and the number of dwellings proposed within each settlement are considered to be appropriate as the general sustainability and availability of facilities have been considered alongside the physical capacity, environmental and infrastructure characteristics of these settlements.

- **Facilities at capacity including local schools and GPs**

Alongside the production of the LDP, the Council has produced its Draft Infrastructure Plan and is supported by a series of associated background papers. This identifies the necessary infrastructure requirements to support the proposed level housing growth within the LDP, and assesses the infrastructure requirements for each housing allocation within the LDP to enable the Council to seek contributions towards new or enhanced provision. In respect of reserve site MG2 (36), the Infrastructure Plan identifies that a developer contribution towards additional pupil places would be required through appropriate planning obligations.

With regard to GP and health services, the Council has worked with the Cardiff and Vale University Health Board to identify areas where additional medical facilities would be required over the LDP period. No specific medical facilities have been identified for this area. It is however anticipated that any future investment in health provision would be funded by Welsh Government Health Department grants.

- **Highway safety would be prejudiced**

Any future development of the site would be required to ensure adequate and safe highway access is provided for all users, and is designed to meet the Council's highway design criteria.

- **Limited public transport provision**

In accordance with Policy MD4 Community Infrastructure and Planning Obligations the Council shall seek further contributions towards the provision of public transport enhancement.

- **Inappropriate over development**

The site directly adjoins the existing built development of Aberthin and is adjacent to the designated settlement boundary for Aberthin area originally defined in the Vale of Glamorgan Unitary Development Plan. The Council is therefore of the opinion that site MG2 (36) provides a logical extension to Aberthin which relates well to the existing settlement.

- **Negative impact on the setting of the village, conservation area and the setting of listed buildings**

Any future development of the site would be required to ensure that it respects the character of the local area, including the setting of the Aberthin as required by LDP policies MD2 Place Making, MD3 Design of New Development and MD9 Historic Environment, as well as Supplementary policy documents such as the Aberthin Conservation Area Management Plan.

- **Increase in the risk of flooding and drainage issues/ surface water run-off onto neighbouring land**

A general response to this issue is contained in 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (36) NRW have not raised any objection to the proposals.

In respect of water infrastructure capacity for site allocation MG 2 (36), Dwr Cymru Welsh Water have advised that:

"A water supply can be provided to service this proposed site. Our local network is considered suffice for the housing density proposed. No problems are envisaged with the public sewerage system for domestic foul discharge from this proposed development. However, off-site sewers are required and these can be provided by a sewer requisition scheme, under Sections 98 – 101 of the Water Industry Act 1991.

In terms of our Waste Water Treatment Works, your Authority are advised that the total density proposed for allocations in Cowbridge (which includes Colwinston and Ystradowen) will exceed the theoretical design of our Cowbridge Waste Water Treatment Works. Dependent on the pace and scale of development, there will ultimately be a time when increased capacity will be required, which will form part of our Asset Management Plan investment."

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **Promote alternative sites (ID-4084/1/1)**

Please refer to the Council's response to alternative sites.

- **It would be necessary to exclude parts of the site from development for archaeological reasons**

The Glamorgan Gwent Archaeological Trust (GGAT) have advised the Council that the site can be developed but some areas of the site may need to be retained as open space to safeguard the loss of any archaeological remains present on the site. Further archaeological investigation will be required prior to development approval to ensure that any archaeological features are safeguarded.

- **Request for an 'eco-survey' to be undertaken due to biodiversity value on the site.**

A general response to this issue is contained in 3.1.5. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with the potential impacts on ecology. In respect of allocation MG2 (36), NRW have not raised an objection to the proposal in respect of the impact on nature conservation interests.

- **Site MG2 [36] was not shown as one of the Candidate Sites for inclusion in the LDP either in the original list or in one of the three subsequent addenda. This site appears to have been hastily added at the last minute (ID:2143/1/1).**

Site MG2 (36) was originally submitted to the Council during the candidate site submission process - the candidate site number for the allocation is 2575/CS1.

- **Moving housing allocations from areas of greatest identified need (South East Zone) to areas of little identified need (minor rural settlements)**

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the settlement hierarchy. This approach is reflected in the level of growth apportioned to each settlement category in the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013).

Additionally, the Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan. This indicates that within the rural housing market areas there is an affordable housing requirement of 35 dwellings per annum. The LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 15. Appendix A 5 of the RHNA seeks to also identify the overall anticipated housing requirement across all tenures (market and affordable housing) between 2010-2030, this projected a requirement within the rural Vale for some

3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Consequently, the Council is of the opinion that there is sufficient evidence to justify a requirement for the provision of housing growth within the rural Vale, and whilst the evidence is not specific to individual settlements, it is considered that the distribution of housing allocations will contribute towards the identified housing needs and reduce the need for existing residents to address their housing requirements elsewhere.

Site MG2- 37 Land to the east of Bonvilston

Representor ID and Name

ID-1112/1/1	ID-5564/1/1	ID-5953/1/1
ID-1438/1/2	ID-5603/1/1	ID-5960/1/1
ID-158/1/1	ID-5629/1/1	ID-6042/1/1
ID-1784/1/2	ID-5643/1/1	ID-6048/1/1
ID-1784/5/2	ID-5644/1/1	ID-6058/1/1
ID-1784/6/1	ID-5657/1/1	ID-6063/1/1
ID-1932/1/1	ID-5669/1/1	ID-6064/1/1
ID-2151/1/1	ID-5677/1/1	ID-6068/1/1
ID-2271/2/1	ID-5697/1/1	ID-6072/1/1
ID-2386/1/1	ID-5706/1/1	ID-6110/1/1
ID-5036/1/2	ID-5724/1/1	ID-6145/1/1
ID-5036/2/1	ID-5757/1/1	ID-6148/3/4
ID-5096/1/34	ID-5758/1/1	ID-6148/3/6
ID-5221/1/1	ID-5859/1/1	ID-6148/4/4
ID-5222/1/1	ID-5896/1/1	ID-6148/4/5
ID-5248/1/1	ID-5897/1/1	ID-6148/5/4
ID-5286/1/1	ID-5899/1/1	ID-6159/1/1
ID-5286/2/1	ID-5900/1/1	ID-6160/1/1
ID-5286/3/1	ID-5902/1/1	ID-6161/1/1
ID-5356/1/1	ID-5933/1/1	ID-6162/1/1
ID-5522/1/1	ID-5949/1/1	ID-6173/2/1
ID-5553/1/1	ID-5950/1/1	ID-6188/1/1
ID-5561/1/1	ID-5951/1/1	ID-6197/1/1
ID-5562/1/1	ID-5952/1/1	ID-6205/1/1

Summary of the Grounds of Objection

- The Council has over estimated its housing requirements – the population projections are incorrect and should be based on latest census data
- Disproportionate increase in the size of Bonvilston
- Negative impact on conservation area - density of development is inappropriate
- Loss of greenfield Grade 2 agricultural land with special landscape interests
- Increase in local traffic congestion and along the A48
- Few local facilities and services
- Impact on existing school capacity
- Development would have a detrimental impact of existing utilities and increase flood risk.
- There is no evidence of affordable housing needed within the village
- Support for a new settlement at Llandow
- Impact of the required additional highway improvements on the character of the area

- Highway safety would be prejudiced
- The transport assessment undertaken by the Vale of Glamorgan is incorrect, and underestimates the impact of traffic as a result of the allocation (ID-1784/1/1)
- Extend the boundary of the allocation for additional housing

Council Response

- **The Council has over estimated its housing requirements – the population projections are incorrect and should be based on latest census data**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement for the LDP period. Further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of site MG2 (37) will assist in providing for the overall housing requirement in the Vale of Glamorgan.

- **Disproportionate increase in the size Bonvilston**

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlement identified within the hierarchy. This approach is reflected in the level of growth apportioned to each settlement category as highlighted within the Housing Land Supply Background Paper (2013). In this regard the Council is of the opinion that on the basis of housing numbers alone, the level of housing proposed for Bonvilston is appropriate in terms of its role as a Minor Rural Settlement.

- **Negative impact on conservation area - density of development is inappropriate**

Any future development of the site would be required to ensure that it respects the character of the local area, including the setting of the Bonvilston Conservation Area as required by LDP Policies MD2 Place Making, MD3 Design of New Development and MD9 Historic Environment and within Supplementary Planning Guidance such as the Bonvilston Conservation Area Management Plan. The proposed density of the site this is approximately 18 dwellings per hectare which is below the target density of 25 dwellings per hectare required under Policy MD7 for Minor Rural Settlements. This has been set to reflect the general density of development within Bonvilston and is considered appropriate density for the site and location.

- **Loss of greenfield Grade 2 agricultural land with special landscape interests**

In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has consulted with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites. With regard to site MG2 (37), consultations have indicated that the quality of the agricultural land may contain Sub Grade 3a, 3b and Grade 2 and further analysis would be required to confirm the actual grading of the land. Following representations received on this issue the Council has prepared a background document considering the Plan's overall impact on Best and Most Versatile (BMV) Agricultural Land (2015) and further site details are contained within this report. The report concludes that there is a relatively small proportion of land allocated within the LDP as being potentially within BMV agricultural land.

With regard to the landscape impact, the Council is of the view that the removal of the land from the Ely Valley and Ridge Special Landscape Area would have a minimal impact on the overall quality and integrity of the

SLA given its proximity to the existing built form of Bonvilston which is partially located within and adjoins the SLA designation.

- **Increase in local traffic congestion and along the A48**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Few local facilities and services**

The Council has undertaken an audit of the services and facilities within each settlement and ranked settlements according to the level of services available within each against the key sustainability measures. Further details on the methodology and findings are set out in the Council's Sustainable Settlements Appraisal Background Paper (2013). The appraisal informed the identified hierarchy of urban and rural settlements reflecting the level of services available within each and considering the role and function of settlements in relation to other settlements. Within the hierarchy, Bonvilston is categorised as being a Minor Rural Settlement alongside 23 other rural villages within this category reflective of the type and range of services and facilities. Within this category there is a broad spectrum of rural settlements, in terms of size and resident population. However the residential site allocations within the LDP, such as the site at Bonvilston, are considered to be appropriate as the general sustainability and availability of facilities have been considered alongside the physical capacity, environmental and infrastructure characteristics of these settlements.

- **Impact on existing school capacity**

Alongside the production of the LDP, the Council has produced its draft Infrastructure Plan and is supported by a series of associated background papers. This identifies the necessary infrastructure requirements to support the proposed level of housing growth within the LDP, and assesses the requirements for each housing allocation within the LDP to enable the Council to seek contributions towards new or enhanced education facility provision. In respect of site allocation MG2 (37), the Infrastructure Plan identifies that this would generate a requirement of 48 additional pupil places, which would be provided by the developer through appropriate planning obligations.

- **Development would have a detrimental impact of existing utilities and increase flood risk.**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (37) NRW have not raised any objection to the proposals.

In respect of water infrastructure capacity for site allocation MG 2 (37), Dwr Cymru Welsh Water (DCWW) have advised that:

"A water supply can be provided to service this proposed site. Our local network is considered suffice for the housing density proposed. No problems are envisaged with the public sewerage system for domestic foul discharge from this proposed development. Potential developers need to be aware that the site is crossed by 225mm diameter public sewer at the southern edge. This sewer may restrict the amount of density proposed

and a protection measure in the form of easement width or diversion of the pipe is required.

The density proposed for this development will exceed the theoretical design of our Bonvilston East Waste Water Treatment Works. Our current Asset Management Plan which runs to year 2015 does not include this works. Should this allocation be included in the Adopted Plan then your Authority would need to release the land in the latter part of the Plan to allow us to include in our submission to Ofwat for funding, and once approved, the time to deliver the essential improvements."

In light of the comments provided by NRW and DCWW, the Council is of the opinion that the site is not constrained by flooding and that the necessary infrastructure can be provided to serve the development.

- **There is no evidence of affordable housing needed within the village**

The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan. This indicates that within the rural housing market areas there is an affordable housing requirement for 35 additional dwellings per annum.

The LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 15. Whilst the study indicates that there is no overall physical requirement for affordable housing, in St Nicholas and Bonvilston, the Council is of the opinion that this masks the fact that the assessment also identified that there were 9 households living in unsuitable affordable housing (Table 6.3), and a net annual housing need of 2 dwellings per annum (Table 6.16). Additionally, the study highlighted that 16 households stated that a member of their household had left the community due to a shortage of suitable housing locally (Table 7.9). Additionally, Appendix A 5 of the RHNA seeks to identify the overall anticipated housing requirement across all tenures (market and affordable housing) between 2010-2030, this projected a requirement for within the rural vale for some 3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Consequently, the Council is of the opinion that there is sufficient evidence to justify a requirement for the provision of housing growth within the rural Vale, and whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (37) will contribute to the identified housing need at ward level and reduce the need for existing residents to address their housing requirements elsewhere

- **Support for a new settlement at Llandow**

Through the candidate sites submissions stage, the Council received some 420 sites for consideration, the majority of which were located in rural locations on greenfield land or adjoining the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the grounds that it would be contrary to the overarching LDP strategy. Further details on this are set out in the Council's Revised Options Appraisal Background Paper .

- **Impact of the required additional highway improvements on the character of the area**

The Council is of the opinion that any necessary highway and access improvements will not have an adverse impact on the character of Bonvilston, and that future development proposals would be designed to comply with the Council's current design criteria.

- **Highway safety would be prejudiced**

Any future development of the site would be required to ensure adequate and safe highway access is provided for all users, and is designed to comply with the Council's highway design criteria.

- **The transport assessment undertaken by the Vale of Glamorgan is incorrect, and underestimates the impact of traffic as a result of the allocation (ID-1784/1/1)**

The Council is of the opinion that the highway assessment is based on a robust and tested methodology and that the findings of the study provides an accurate reflection of current highway movements and likely traffic impacts generated from housing allocation MG2 (37). It should also be noted that the Council's Highway Impact Assessment has been undertaken by the Council to identify the strategic assessment of the impact of the Deposit LDP allocations on existing traffic flows. In considering future development proposals, Appendix 5 of the Deposit LDP clearly stipulates that each housing allocation will be required to be supported by "a comprehensive and robust Transport Assessment that evaluates and determines mitigation measures which alleviate any detrimental impact future development proposals will have on the local highway network and associated road conjunctions".

- **Extend the boundary of the allocation for additional housing**

The Council is of the opinion that there is no requirement for the provision of additional housing land to meet the identified housing requirement and therefore there is no justification to extend housing allocation MG2 (37) as proposed.

Site MG2-38 Land to rear of St Davids Church in Wales Primary School, Colwinston

Representor ID and Name

ID-1479/1/3	ID-5307/1/1	ID-5591/1/1
ID-2076/3/1	ID-5346/1/1	ID-5604/1/1
ID-2185/1/1	ID-5351/1/1	ID-5618/1/1
ID-2185/2/1	ID-5352/1/1	ID-5626/1/1
ID-2185/3/1	ID-5361/1/1	ID-5633/1/1
ID-2185/4/1	ID-5366/1/1	ID-5634/1/1
ID-2185/5/1	ID-5379/1/1	ID-5635/1/1
ID-2185/6/1	ID-5385/1/1	ID-5636/1/1
ID-2251/1/1	ID-5388/1/1	ID-5642/1/1
ID-2251/1/2	ID-5391/1/1	ID-5650/1/1
ID-2251/2/1	ID-5395/1/1	ID-5652/1/1
ID-3571/1/1	ID-5397/1/1	ID-5681/1/1
ID-3596/4/1	ID-5398/1/1	ID-5683/1/1
ID-3635/1/1	ID-5421/1/1	ID-5687/1/1
ID-3636/1/1	ID-5422/1/1	ID-5703/1/1
ID-3707/1/1	ID-5423/1/1	ID-5712/1/1
ID-3725/1/1	ID-5424/1/1	ID-5716/1/1
ID-3725/2/1	ID-5425/1/1	ID-5718/1/1
ID-3738/1/1	ID-5443/1/1	ID-5720/1/1
ID-3738/1/2	ID-5449/1/1	ID-5764/1/1
ID-3760/1/1	ID-5474/1/1	ID-5765/1/1
ID-3796/1/1	ID-5476/1/1	ID-5781/1/1
ID-3846/1/1	ID-5488/1/1	ID-5789/1/1
ID-3846/2/1	ID-5490/1/1	ID-5790/1/1
ID-3846/3/1	ID-5491/1/1	ID-5795/1/1

ID-3846/4/1	ID-5499/1/1	ID-5801/1/1
ID-3895/1/1	ID-55/1/3	ID-5802/1/1
ID-3986/1/1	ID-55/2/1	ID-5815/3/10
ID-4108/1/1	ID-5515/2/1	ID-5815/4/1
ID-4184/1/1	ID-5547/1/1	ID-5946/1/1
ID-4673/1/17	ID-5547/1/2	ID-5958/1/1
ID-4720/1/1	ID-5547/1/3	ID-6040/1/1
ID-4933/1/2	ID-5547/1/4	ID-6143/1/1
ID-5020/2/2	ID-5574/1/1	ID-6164/1/1
ID-5020/3/2	ID-5578/1/1	ID-6174/3/3
ID-5026/1/1	ID-5590/1/1	ID-6189/1/1

Summary of the Grounds of Objection

- Support for a new settlement at Llandow as an alternative to proposed allocation
- Lack of services and facilities within Colwinston
- Insufficient evidence for housing in the area especially affordable housing
- Increase in traffic congestion and traffic/pedestrian accidents
- The scale of development proposed is disproportionate to Colwinston
- Loss of agricultural land
- Intrusive development into the countryside
- Exacerbate existing flooding problems
- Limited capacity at St David's Primary School and no proposals to upgrade the school
- Adverse impact on the conservation area
- Negative impact on water supply and sewerage infrastructure
- Loss of biodiversity
- Amend alternative site within the village – extend allocation
- Contrary to LDP Policies MD1 MD2, MD3, MD6, MD8, MD9, SP7

Council Response

The site is the subject of a full planning consent (2014/00242/FUL) which was granted on 15/1/15. The areas of objection within the representations have been considered by the Council in its decision to grant permission for development.

Site MG2-39 ITV Wales, Culverhouse Cross

Representor ID and Name

ID-80/1/4	ID-2533/1/1	ID-6006/1/2
ID-2036/4/11	ID-2533/2/1	

Summary of the Grounds of Objection

- Objection to the required highway improvement between the A4050 Port Road and Copthorne Way to the A48
- Delete allocation and substitute with alternative site at Walters Farm Weycock Cross
- Loss of employment uses/ site should be retained for employment use
- Question over deliverability of the allocation to the A48
- Inadequate public transport provision
- No requirement for affordable housing
- Objection to site in support of alternative sites at Weycock Cross Barry
- Requires significant infrastructure and highway upgrades due to the local highway network's congested state

<ul style="list-style-type: none"> Proposal for the inclusion of a Green Belt designation to include the area of countryside to the north of Barry to the M4 Motorway and west of Wenvoe and Culverhouse Cross with the exclusion of the area within the Urban settlement areas of Penarth, Llandough (Penarth), Dinas Powis, Sully, Wenvoe, and the area of Culverhouse Cross
<p><i>Council Response</i></p> <p>The site is the subject of an extant planning consent (2013/001152/OUT) refers; the areas of objection within the representations have been considered by the Council in its decision to grant permission for development.</p>

Site MG2-40 The Garden Emporium, Fferm Goch		
Representor ID and Name		
ID-3501/1/1	ID-4187/1/1	
<p><i>Summary of the Grounds of Objection</i></p> <ul style="list-style-type: none"> Objection to the granting of planning permission on the grounds that Fferm Goch is not a sustainable settlement Identification of Fferm Goch as a minor rural settlement is incorrect Over development of the site Poor site access Lack of services and facilities Impact on biodiversity and ecological interests Existing infrastructure will not be able to support a further 40 houses Lack of public transport facilities available Issues with highway safety Loss of biodiversity and ecology 		
<p><i>Council Response</i></p> <p>The site is the subject of a full planning consent (2014/00849/FUL) refers and is under construction; the areas of objection within the representations have been considered by the Council in its decision to grant permission for development.</p>		

Site MG2-41 Ogmore Residential Centre		
Representor ID and Name		
ID-5301/1/1		
<p><i>Summary of the Grounds of Objection</i></p> <ul style="list-style-type: none"> The site does not have appropriate access Impact on existing residential amenity 		
<p><i>Council Response</i></p> <p>The site is the subject of an extant planning consent (2013/00862/RES) refers; the areas of objection within the representations have been considered by the Council in its decision to grant permission for development.</p>		

Site MG2-42 Ogmores Caravan Park
Representor ID and Name
ID-5301/2/1
<i>Summary of the Grounds of Objection</i>
<ul style="list-style-type: none"> • The site does not have appropriate access • This site needs its own access road and its own services provision.
<i>Council Response</i>
The site is the subject of an extant planning consent (2009/01273/OUT) refers; the areas of objection within the representations have been considered by the Council in its decision to grant permission for development.

Site MG2-43 Land to the East of St Nicholas		
Representor ID and Name		
ID-1070/1/1	ID-4641/1/1	ID-5673/1/1
ID-1164/1/1	ID-4673/1/18	ID-5675/1/1
ID-1165/1/1	ID-4682/1/1	ID-5678/1/1
ID-1180/1/1	ID-4689/1/1	ID-5692/1/1
ID-1183/1/1	ID-4691/1/1	ID-5741/1/1
ID-1261/1/1	ID-4698/1/1	ID-5751/1/1
ID-1279/1/1	ID-4699/1/1	ID-5778/1/1
ID-1438/1/1	ID-4701/1/2	ID-5797/1/1
ID-1440/1/1	ID-4704/1/1	ID-5798/1/1
ID-1580/1/1	ID-4706/1/1	ID-5799/1/1
ID-1648/1/1	ID-4760/1/1	ID-5800/1/1
ID-1701/1/1	ID-4770/1/1	ID-5845/1/1
ID-1701/1/4	ID-4824/1/1	ID-5860/1/1
ID-1784/1/3	ID-4904/1/1	ID-5861/1/1
ID-1784/2/1	ID-4919/1/1	ID-5862/1/1
ID-1784/3/1	ID-4925/1/1	ID-5863/1/1
ID-1784/4/1	ID-4925/1/2	ID-5864/1/1
ID-1784/5/3	ID-4945/1/1	ID-5865/1/1
ID-1784/6/2	ID-4969/1/1	ID-5866/1/1
ID-196/1/1	ID-5036/1/1	ID-5867/1/1
ID-2271/1/1	ID-5036/2/2	ID-5868/1/1
ID-2368/1/1	ID-5062/1/1	ID-5869/1/1
ID-2378/1/1	ID-5096/1/35	ID-5870/1/1
ID-2378/2/1	ID-5374/1/1	ID-5895/1/1
ID-2378/5/1	ID-5375/1/1	ID-5911/1/1
ID-3495/1/1	ID-5429/1/1	ID-5913/1/1
ID-3596/4/3	ID-5430/1/1	ID-5917/1/1
ID-3813/1/1	ID-5500/1/1	ID-5962/1/1
ID-3855/1/1	ID-5501/1/1	ID-5963/1/1
ID-3863/1/1	ID-5529/1/1	ID-5964/1/1
ID-3874/1/1	ID-5533/1/1	ID-6028/2/1
ID-3891/1/1	ID-5542/1/1	ID-6028/6/1

ID-3900/1/1	ID-5544/1/1	ID-6033/1/1
ID-3925/1/1	ID-5546/1/1	ID-6037/1/1
ID-3948/1/1	ID-5552/1/1	ID-6069/1/1
ID-4094/1/1	ID-5554/1/1	ID-6146/1/1
ID-4109/1/1	ID-5561/1/2	ID-6187/1/1
ID-4278/1/1	ID-5582/1/1	

Summary of the Grounds of Objection

- The Council has over estimated its housing requirements – the population projections are incorrect and should be based on latest census data
- Disproportionate increase in the size of St Nicholas
- Negative impact on conservation area - density of development is inappropriate
- Loss of greenfield Grade 2 agricultural land with special landscape interests
- Increase in local traffic congestion and along the A48
- Impact on the few local facilities and services in St Nicholas including schools
- There is no evidence of affordable housing needed within the village
- The allocation is contrary to policies set out in the Deposit LDP, particularly parts of Policies MD 2, MD 3, MD 6, MD 7 and MD 11
- Support for a new settlement at Llandow
- The site should be reallocated as a green wedge to prevent coalescence with Culverhouse Cross
- The proposed open space provision is inadequate for the proposed number of houses
- Impact of the required additional highway improvements on the character of the area
- The site has no relationship to the existing village and the extant development. The site of the development does not conform to a logical boundary for the village.
- Highway safety would be prejudiced
- The transport assessment undertaken by the Vale of Glamorgan is incorrect, and underestimates the impact of traffic as a result of the allocation (ID-1784/1/1)
- The Council's candidate site assessment and site sustainability is flawed
- Increased flood risk to Dyffryn House and Gardens
- Extend the boundary of the allocation for additional housing (ID-2378/1/1)
- Amend site boundary to include the Ger-y-Llan (ID-2378/2/1)
- The number of houses to be reduced to 50 and the open space provision to be increased

Council Response

- The Council has over estimated its housing requirements – the population projections are incorrect and should be based on latest census data

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement over the LDP, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the Deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. The development of site MG2 -43 will assist in proving for the overall housing requirement in the Vale of Glamorgan.

- **Disproportionate increase in the size of St Nicholas**

A general response to this issue is contained in paragraph 3.1.8. In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the settlement hierarchy. This

approach is reflected in the level of growth apportioned to each settlement category in the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). In this regard the Council is of the opinion that on the basis of housing numbers alone, the level of housing proposed for St Nicholas is appropriate in terms of its role as a Minor Rural Settlement.

- **Negative impact on conservation area - density of development is in appropriate**

A general response to this issue is contained in paragraph 3.1.7. Any future development of the site would be required to ensure that it respects the character of the local area, including the setting of the St Nicholas Conservation Area as required by LDP Policies MD2 - Place Making, MD3 Design of New Development and MD9 – Historic Environment, alongside the St Nicholas Conservation Area Management Plan. The density of the site allocation is approximately 25 dwellings per hectare in line with average density required under Policy MD7. This is to reflect the general density of development within St Nicholas and is considered appropriate to the site and its location.

- **Loss of greenfield Grade 2 agricultural land with special landscape interests**

A general response to this issue is contained in paragraph 3.1.5. In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has worked closely with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites.

With regard to site MG2 (43) the Welsh Government has indicated that the quality of the agricultural land may be either Grade 3a or 3b and would require further analysis to confirm the actual grading of the land. Notwithstanding this the WG did not raise any objection to the development of this land.

With regard to the landscape impact, the Council is of the view that the removal of the land from the Ely Valley and Ridge Special Landscape Area would have a minimal impact on the overall quality and integrity of the SLA given its proximity to the existing built form of St Nicholas which is also located within the SLA.

- **Increase in local traffic congestion and along the A48**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Impact on the few local facilities and services in St Nicholas including schools**

A general response to this issue is contained in paragraph 3.1.5. The Infrastructure Plan sets out the infrastructure requirements arising from the new residential developments. Appendix 1 (p85) highlights the new infrastructure required for site MG2 (43) which includes contributions for sustainable transport, an on-site play area and open space, additional school places, enhancements to the local library and a built sports facility.

In addition, the Council has undertaken an audit of the services and facilities within each settlement and ranked settlements according to the level of services available within each against the key sustainability

measures. Further details on the methodology and findings are set out in the Council's Sustainable Settlements Appraisal Background Paper (2013). The appraisal informed the identified hierarchy of urban and rural settlements reflecting the level of services available within each and considering the role and function of settlements in relation to other settlements. Within the hierarchy, St Nicholas is categorised as being a Minor Rural Settlement alongside 23 other rural villages within this category reflective of the type and range of services and facilities. Within this category there is a broad spectrum of rural settlements, in terms of size and resident population. However, the residential site allocations within the LDP, such as the site at St Nicholas, and the number of dwellings proposed within each settlement are considered to be appropriate as the general sustainability and availability of facilities have been considered alongside the physical capacity, environmental and infrastructure characteristics of these settlements.

- **There is no evidence of affordable housing needed within the village**

The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan. This indicates that within the rural housing market areas there is an affordable housing requirement for 35 additional dwellings per annum.

The LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 15. Whilst the study indicates that there is no overall physical requirement for affordable housing, in St Nicholas and Bonvilston, the Council is of the opinion that this masks the fact that the assessment also identified that there were 9 households living in unsuitable affordable housing (Table 6.3), and a net annual housing need of 2 dwellings per annum (Table 6.16). Additionally, the study highlighted that 16 households stated that a member of their household had left the community due to a shortage of suitable housing locally (Table 7.9). Additionally, Appendix A 5 of the RHNA seeks to identify the overall anticipate housing requirement across all tenures (market and affordable housing) between 2010-2030, this projected a requirement within the rural Vale for some 3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Consequently, the Council is of the opinion that there is sufficient evidence to justify a requirement for the provision of housing growth within the rural Vale, and whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (43) will contribute to the identified housing need at the ward level and reduce the need for existing residents to address their housing requirements elsewhere.

- **The allocation is contrary to policies set out in the Deposit LDP, particularly parts of Policies MD 2, MD 3, MD 6, MD 7 and MD 11**

The policies referred to relate to the control of future development additional to housing allocations within the LDP. In identifying housing allocations within the LDP the Council has taken into consideration the impact that the proposed development would have on the wider settlement, in relation to potential coalescence of settlements, inappropriate development in the countryside and impact on the character of the settlement.

- **Support for a new settlement at Llandow**

Through the candidate sites submissions stage, the Council received some 420 sites for consideration, the majority of which were located in rural locations on greenfield land or adjoining the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the grounds that out of those considered it would not provide the a sustainable Strategy option. Amongst other considerations it was noted that the proposal included a significant amount of greenfield and agricultural land, the surrounding brownfield land did not form part of the development and the proposal would likely lead to an increase in peak

time commuting. The proposal was therefore considered to contrary to national planning policy for the consideration of new settlements contained within Planning Policy Wales. Further details on this are set out in the Council's Revised Options Appraisal Background Paper (March 2009). Proposals for the allocation of a new settlement are therefore contrary to the overarching LDP Strategy. Furthermore, the LDP makes sufficient provision to meet the identified housing requirement without the need for a different approach such as a new settlement or other alternative site.

- **The site should be reallocated as a green wedge to prevent coalescence with Culverhouse Cross**

The Council is of the opinion that the development of MG2 (43) would not lead to further development that would create coalescence with Culverhouse Cross. Indeed, future development proposals with St Nicholas will safeguard inappropriate development within the countryside as set out in policies MD1 Location of Development, MD2 Place Making, MD3 Design and MD5 Development within Minor Rural Settlements. Additionally, in selecting sites for inclusion in the Deposit LDP, the Council's Candidate Site process specifically considered the potential for coalescence of settlements, and this was considered not to be the case in relation to MG2 (43).

In addition, Policy MG18 (3) has identified the land north of Wenvoe as a green wedge which will prevent St Nicolas merging with Culverhouse Cross.

- **The proposed open space provision is inadequate for the proposed number of houses**

The Council is of the opinion that the open space provision will be appropriate to the proposed number of dwellings allocated. Moreover, the open space requirement allocated alongside site MG2 (43) has been made to address the deficiency of open space provision identified within the Council's Open Space Background Paper (Submission Document No. 29).

- **Impact of the required additional highway improvements on the character of the area**

The Council is of the opinion that any necessary highway and access improvements will not have an adverse impact on the character of St Nicholas, and that this would be designed to meet the Council's current design criteria.

- **The site has no relationship to the existing village and the extant development. The site of the development does not conform to a logical boundary for the village.**

The site directly adjoins the existing built development of St Nicholas, and is adjacent to the designated settlement boundary originally defined in the Vale of Glamorgan Unitary Development Plan. The Council is therefore of the opinion that site MG2 (43) provides a logical extension to St Nicholas.

- **Highway safety would be prejudiced**

Any future development of the site would be required to ensure adequate and safe highway access is provided for all users, and is designed to comply with the Council's highway design criteria.

- **The transport assessment undertaken by the Vale of Glamorgan is incorrect, and underestimate the impact of traffic as a result of the allocation**

The Council is of the opinion that the highway assessment is based on a robust and tested methodology and that the findings of the study provide an accurate reflection of current highway movements and likely traffic

impacts generated from housing allocation MG2 (43). It should also be noted that the Council's Highway Impact Assessment has been undertaken by the Council to identify the strategic assessment of the impact of the Deposit LDP allocations on existing traffic flows. In considering future development proposals, Appendix 5 of the Deposit LDP clearly stipulates that each housing allocation will be required to be supported by "a comprehensive and robust Transport Assessment that evaluates and determines mitigation measures which alleviate any detrimental impact future development proposals will have on the local highway network and associated road conjunctions".

- **The Council's candidate site assessment and site sustainability is flawed**

It is the Council's opinion that the Candidate Site Assessment and Sustainability Assessment provide a logical and sound approach for assisting in the identification of suitable development sites. Through these assessments the Council has appraised some 420 sites submitted through the candidate site process, and consulted with external statutory agencies who have provided site specific information which has assisted in identifying the most appropriate and deliverable sites for development within the Deposit LDP.

- **Increased flood risk to Dyffryn House and Gardens**

A general response to this issue is contained paragraph in 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (43) NRW have not raised any objection to the proposals.

- **Extend the boundary of the allocation for additional housing (ID-2378/1/1)**

The Council is of the opinion that there is no requirement for the provision of additional housing land to meet the identified housing requirement and therefore there is no justification to extend housing allocation MG2 (43) as proposed.

- **Amend site boundary to include Ger-y-Llan as a potential access (ID-2378/2/1)**

The proposed amendment seeks to include the existing access road at Ger-y-Llan within the overall housing allocation. The site allocation adjoins the A48 and it is considered the suggested change is unnecessary as suitable highway access arrangements can be determined as part of any future planning application for the site. It is understood that Ger-y-lan is currently sub-standard and is not suitable for providing vehicular access to the site although there may be scope to accommodate walking and cycling access. This would be subject to the consideration of detail proposals at the planning application stage where any proposed improvements and agreed access arrangements can be considered in detail.

- **The number of houses to be reduced to 50 and the open space provision to be increased**

The Council considers that the scale of the housing and open space provision appropriate.

Site MG2-44 Land off St. Brides Road, Wick

Representor ID and Name

ID-125/1/3	ID-3596/4/4	ID-5704/1/1
ID-1479/1/4	ID-3597/1/1	ID-5815/3/11
ID-2062/1/2	ID-4042/1/1	ID-5815/4/2
ID-2522/2/1	ID-4042/2/1	ID-5880/1/1
ID-3587/1/1	ID-4673/1/16	ID-6174/3/4

ID-3596/3/1	ID-5473/1/1	ID-6190/1/1
<p><i>Summary of the Grounds of Objection</i></p> <ul style="list-style-type: none"> • The proposed development would significantly increase the size of the village- this should be capped at 10%. • The loss of green field open space would alter the character of Wick • The proposed site currently provides views out of the village towards the Heritage Coast. • The proposed development would place strain on existing roads, public transport and local amenities, schools and shops. • Increased traffic congestion leading to the detriment of highway safety and climate change • Drainage, water supplies and sewerage facilities are at capacity • Insufficient evidence to support a need for housing, including affordable housing in Wick • Overprovision of affordable housing allocated on the development site • Supports a new settlement at Llandow • That Wick is not a sustainable location • Developer requirements such as landscape and ecology assessments should have been undertaken before allocating the site for housing • Loss of Grade 2 agricultural land • The site contains grade 1 limestone deposits • Development not shared fairly across rural Vale to allow villages to grow at a more considerate level especially in light of employment and facilities. • Lack of settlement boundaries may weaken countryside protection policies (ID: 4042/2/1) 		
<p><i>Council Response</i></p> <ul style="list-style-type: none"> • The proposed development would significantly increase the size of the village - this should be capped at 10%. <p>Within the Minor Rural Settlement category there is a broad spectrum of settlements, in terms of spatial size and resident population, and as such it is inappropriate to compare the dwelling numbers within settlements as this does not take into account the physical capacity of each village within the hierarchy to accommodate additional housing, their physical, environmental and infrastructure characteristics. It is the Council opinion that housing allocation MG2 (44) provides a logical extension to Wick that would not have a detrimental impact to its character and any concerns regarding highway safety, flooding and capacity of services and facilities have been fully addressed.</p> <ul style="list-style-type: none"> • The loss of green field open space would alter the character of Wick <p>A general response to this issue is contained in paragraph 3.1.7. It is the Council opinion that housing allocation MG2 (44) provides a logical extension to Wick and would not have a detrimental impact to its character. Furthermore, any future development of the site would be required to ensure that it respects the character of the local area as required by LDP Policies MD2 Place Making, MD3 Design of New Development and MD9 Historic Environment.</p> <ul style="list-style-type: none"> • The proposed site currently provides views out of the village towards the Heritage Coast. <p>It is considered that the development would not have a significant negative impact on the setting and character of the heritage coast. Additionally, the loss of existing views by residents is not considered to be a material planning matter for the LDP.</p> <ul style="list-style-type: none"> • The proposed development would place strain on existing roads, public transport and local 		

amenities, schools and shops.

Alongside the production of the LDP, the Council has produced its Draft Infrastructure Plan and is supported by a series of associated background papers. This identifies the necessary infrastructure requirements to support the proposed level housing growth within the LDP, and assesses the infrastructure requirements for each housing allocation within the LDP to enable the Council to seek developer contributions towards new or enhanced provision under the Plan's policies.

In respect of site MG2 (44), the Infrastructure Plan identifies that this would generate a requirement of 53 additional pupil places, which would be provided by the developer through appropriate planning obligations. Further contributions towards the provision of public transport enhancement, open space provision will also be sought in accordance with Policy MD4 Community Infrastructure and Planning Obligations. It is also considered that additional housing will assist in supporting existing local services such as shops and public houses.

- **Increased traffic congestion leading to the detriment of highway safety and climate change.**

A general response to this issue is contained in paragraph 3.1.1. Any future development of the site would be required to ensure adequate and safe highway access is provided for all users, and is designed to comply with the Council's highway design criteria. In identifying site allocations the Council has sought to locate new development within settlements with access to existing services and facilities, in accordance with the LDP Strategy, in order to meet local housing needs whilst minimising the need to travel. Wick has been identified as a Minor Rural Settlement within the Plan's Settlement Hierarchy and further details can be found at paragraph 3.1.9 and within the Sustainable Settlements Appraisal (2013) background paper.

- **Drainage, water supplies and sewerage facilities are at capacity**

In respect of existing mains water infrastructure, Dwr Cymru Welsh Water (DCWW) have raised no objection to the development but have provided the following advice

"The water supply in this area forms part of our Llantwit Major network which is at the extremity of our supplies. Extensive improvements are required and we will include this work in our submission to Ofwat for the next round of funding for the period 2015 – 2020.

Our local sewer network is too small to accommodate the foul flows from this development. A hydraulic modelling assessment will be required to establish the point of connection to the public sewer system and / or any improvement work required. Potential developers need to be aware that the site is crossed by 6inch diameter public sewer through the centre. This sewer may restrict the amount of density proposed and a protection measure in the form of easement width or diversion of the pipe is required.

Our Wick Waste Water Treatment Works (WwTW) can accommodate the foul flows from this proposed site."

In light of the comments provided by DCWW, the Council is of the opinion that the necessary infrastructure can be provided to serve the development.

- **Insufficient evidence to support a need for housing, including affordable housing in Wick**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement for the LDP period and further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the Deposit

LDP has made adequate provision to meet the identified housing requirement over the plan period. MG 2 (44) will assist in meeting the overall housing requirement in the Vale of Glamorgan.

The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan and identifies an overall affordable housing need of 915 affordable dwellings across the Vale of Glamorgan over the period 2010 to 2015. Table 6.13 shows the geographical distribution of affordable housing requirements across the Vale of Glamorgan's housing market areas. This indicates that within the rural housing sub market area there is an affordable housing requirement for 35 additional dwellings per annum. In addition, the LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 2015. Within Wick, the RHNA indicates that there is a need for the provision of 1 affordable dwelling per annum, however the study also revealed that 5 existing households planned to leave the area due to the lack of suitable affordable housing (Table 6.9).

Consequently, the Council considered that there is sufficient evidence to justify a requirement for the level of housing growth within Wick. Whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (46) will contribute towards meeting local housing needs within the wider rural Vale, reducing the need for existing residents and new households to meet their housing requirements elsewhere.

- **Overprovision of affordable housing allocated on the development site**

As noted above, the level of housing and affordable housing provision is considered to be evidenced and justified within the LHMA and the Council's other background papers. Affordable housing provision will be sought in accordance with the percentage requirements set out in Policy MG 4 (Affordable Housing). These have been based on a viability assessment and are considered to be deliverable and realistic targets. Further information can be found in the Affordable Housing Viability Assessment Update (2014).

- **Supports a new settlement at Llandow**

Through the candidate sites submissions stage, the Council received some 420 sites for consideration, the majority of which were located in rural locations on greenfield land or adjoining the existing larger urban settlements. In this regard, the Council discounted a new settlement at Llandow on the grounds that out of those considered it would not provide the a sustainable Strategy option. Amongst other considerations it was noted that the proposal included a significant amount of greenfield and agricultural land, the surrounding brownfield land did not form part of the development and the proposal would likely lead to an increase in peak time commuting. The proposal was therefore considered to contrary to national planning policy for the consideration of new settlements contained within Planning Policy Wales. Further details on this are set out in the Council's Revised Options Appraisal Background Paper (March 2009). Proposals for the allocation of a new settlement are therefore contrary to the overarching LDP Strategy. Furthermore, the LDP makes sufficient provision to meet the identified housing requirement without the need for a different approach such as a new settlement or other alternative site.

- **Wick is not a sustainable location**

The Council has undertaken an audit of the services and facilities within each settlement and ranked settlements according to the level of services available within each against the key sustainability measures. Further details on the methodology and findings are set out in the Council's Sustainable Settlements Appraisal Background Paper (2013). The appraisal informed the identified hierarchy of urban and rural settlements reflecting the level of services available within each and considering the role and function of settlements in

relation to other settlements. Within the hierarchy, Wick is categorised as being a Minor Rural Settlement alongside 23 other rural villages within this category reflective of the type and range of services and facilities. Within this category there is a broad spectrum of rural settlements, in terms of size and resident population. However, the residential site allocations within the LDP, such as the site at Wick, and the number of dwellings proposed within each settlement are considered to be appropriate as the general sustainability and availability of facilities have been considered alongside the physical capacity, environmental and infrastructure characteristics of these settlements.

- **Developer requirements such as landscape and ecology assessments should have been undertaken before allocating the site for housing**

A general response to this issue is contained in paragraph 3.1.6. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding alongside potential impacts on ecology. In respect of allocation MG2 (44) NRW have not raised any objection to the housing allocation in relation to nature conservation issues.

- **Loss of Grade 2 agricultural land**

A general response to this issue is contained in paragraph 3.1.5. In selecting suitable sites for development, the Council has sought to clarify the agricultural quality of the allocated sites, and has worked closely with the Welsh Government's Natural Environment and Agriculture Department to ascertain the quality of land for allocated sites.

With regard to site MG2 (44) the Welsh Government has indicated that the quality of the agricultural land is likely to be below the Best and Most Versatile quality, but a site specific survey should be undertaken to verify the grading of the land. The Council has followed this advice and Appendix 5 of the Deposit LDP indicates that an agricultural land survey shall be required as part of any future development proposal on the site.

- **The site contains grade 1 limestone deposits**

The Council has identified that there are potential limestone deposits in the vicinity of MG2 (44), however the Council is of the view that development would not prejudice the supply of limestone resources.

- **Development not shared fairly across rural Vale to allow villages to grow at a more considerate level especially in light of employment and facilities.**

Within the Minor Rural Settlement category there is a broad spectrum of settlements, in terms of spatial size and resident population, and as such it is inappropriate to compare the dwelling numbers within settlement as this does not take into account the physical capacity of each village within the hierarchy to accommodate additional housing as well as their physical, environmental and infrastructure characteristics. It is the Council opinion that housing allocation MG2 (44) provides a logical extension to Wick, that would not have a detrimental impact to its character and any concerns regarding highway safety, flooding and capacity of services and facilities have been fully addressed.

- **Lack of settlement boundaries may weaken countryside protection policies**

Please refer to the Council's response to representations made in respect of policy MD6 Development in Minor Rural Settlements

Site MG2-45 Land off Sandy Lane, Ystradowen

Representor ID and Name

ID-1479/4/1	ID-5432/1/1	ID-5903/1/1
ID-1479/4/10	ID-5486/1/1	ID-5906/1/1
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ID-5378/1/1	ID-5901/1/1	

Summary of the Grounds of Objection

- The number of dwellings proposed of 111 dwellings (including potential windfall developments) is disproportionate-
- The Welsh Government has raised concerns over the disproportionate level of housing in rural villages (e.g. Wick, Ystradowen, Colwinston)

- The Council has provided no evidence to support why 85 dwellings have been allocated within Ystradowen, and no evidence to indicate what the local need is for Ystradowen
- Reinstate the Ystradowen UDP settlement boundary
- Lack of safe walking and cycling provision outside of the village and no public transport provision for Ystradowen
- Additional housing shall increase the number of car journeys, create additional congestion, and increase the use of rural roads as “rat runs”
- Access via Badgers Brook and Sandy Lane are wholly unsatisfactory due to the current excess traffic, narrowness of existing roads, and poor visibility
- The allocation is prone to flood risk and development would exacerbate the situation
- The proposal to remove residential settlement boundary will further increase development pressures on Ystradowen and other rural villages
- The proposal shall place pressure on existing school provision
- Challenge the findings of the Council's Sustainable Settlements Background Document identifying Ystradowen as a sustainable location for future housing development- scoring the lowest sustainability score of all minor rural villages
- The Council's Community Facilities Background Paper has not identified any requirement for the provision of new community facilities to support the proposed development which are much needed

Council Response

Part of the site is now the subject of an extant planning consent; the areas of objection within the representations which relate to the approved application (Land of Badgers Brook application 2013/00856/OUT) have been considered by the Council in its decision to grant permission for development.

- **The number of dwellings proposed of 111 dwellings (including potential windfall developments) is disproportionate**

Within the Minor Rural Settlement category there is a broad spectrum of settlements, in terms of spatial size and resident population, and as such it is inappropriate to compare the dwelling numbers within settlements as this does not take into account the physical capacity of each village within the hierarchy to accommodate additional housing or their physical, environmental and infrastructure characteristics. It is the Council opinion that housing allocation MG2 (45) provides a logical extension to Ystradowen, that would not have a detrimental impact to its character and any concerns regarding highway safety, flooding and capacity of services and facilities can be fully addressed.

- **The Welsh Government has raised concerns over the disproportionate level of housing in rural villages (e.g. Wick, Ystradowen, Colwinston)**

The Council's Housing Land Supply Background Paper indicates that the spatial distribution of housing across the Vale of Glamorgan. The Council considers that the distribution of housing in the Deposit LDP is appropriate given the housing need across the Vale of Glamorgan and that this is consistent with LDP Strategy to focus development within the South Eastern area of the Vale of Glamorgan, the St Athan area and development in other sustainable settlements.

In addition to the LDP Strategy, a number of factors were considered in the allocation of sites for housing, namely the Settlement Hierarchy, which was informed by the Council's Sustainable Settlements Appraisal, and the Site Assessment process which considered to appropriateness of individual site allocations. The Council has sought to ensure that the overall distribution of housing contributes to the achievement of the Plan's objectives,

with the majority of growth directed to the main urban settlements, or other areas with existing services and facilities, in line with national planning policy. In addition, a minor proportion of the overall housing growth has been directed towards the smaller rural settlements to assist in supporting vibrant local communities meet local housing needs and maintaining accessible local services. This is of particular importance given that the Vale of Glamorgan is predominantly rural in character.

- **The Council has provided no evidence to support why 85 dwellings have been allocated within Ystradowen, and no evidence to indicate what the local need is for Ystradowen**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement over the LDP, further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period. MG 2 (45) will assist in meeting for the overall housing requirement in the Vale of Glamorgan.

The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan. This indicates that within the rural housing market areas there is an affordable housing requirement for 35 additional dwellings per annum. The LHMA is supplemented by the Rural Housing Needs Assessment, which refines the affordable housing needs within rural villages identifying an annual requirement for 250 affordable dwellings between 2010 and 2015. Of which 22 affordable dwellings per annum are required within the Cowbridge and Llanblethian ward, which includes the village of Ystradowen. Additionally, Appendix A5 of the RHNA seeks to identify the overall anticipated housing requirement across all tenures (market and affordable housing) between 2010-2030, this projected a requirement for within the rural vale for some 3,266 additional market dwellings, 370 intermediate tenure dwellings and 1,372 social rented dwellings (Tables A5.4-A5.6 refers).

Consequently, the Council is of the opinion that there is sufficient evidence to justify a requirement for the provision of housing growth within the rural Vale, and whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (45) shall contribute towards the identified housing needs identified at the ward level.

- **Reinstate the Ystradowen UDP settlement boundary**

Whilst settlement boundaries are a widely accepted planning policy tool for managing development and enabling local authorities to distinguish between built up areas and countryside, there is no specific requirement within national planning policy for local planning authorities to identify settlement boundaries when preparing development plans. Where references are made to settlement boundaries within Planning Policy Wales these are made within the context of safeguarding the countryside and encouraging sustainable development by directing new development either within or in close proximity to existing settlements, for example;

"4.7.8 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. 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."

However, TAN 6 Planning for Sustainable Rural Communities (July 2010) recognises that in rural areas settlement boundaries can limit the provision of housing to meet local needs, advising that "In smaller settlements, planning authorities should consider including criteria based policy against which planning

applications can be assessed, rather than identifying settlement boundaries. (Paragraph 2.26 refers).

Within this policy context, in preparing the Deposit LDP, the Council has considered maintaining of settlement boundaries, and identified both advantages and disadvantages.

The Council acknowledges that maintaining settlement boundaries would provide the Council with a long standing approach to restricting inappropriate expansion of development into the countryside, and provide certainty to communities, landowners and developers as to where the Council wishes to see future development occur. Within the larger settlements, maintaining settlement boundaries would ensure that priority is given to the delivery of LDP housing allocations which could be undermined by potential future windfall development on the edge of the settlement boundary (as evident by recent speculative proposals at Weycock Cross, Barry and Primrose Hill, Cowbridge).

One of the key disadvantages of settlement boundaries is that this creates a general presumption that development within boundaries is acceptable- in rural settlements this is particularly problematic as it places pressure on infill development which can impact on the character of rural settlements. Additionally, this presumption in favour of development increases land values within boundaries compared to that outside of the settlement boundaries, but also creates “hope values” on land adjoining settlement boundaries (i.e. that the land could be included sometime in the future through for example a plan review). The latter reduces the opportunities for “rural exceptions” affordable housing, and increases the affordability gap in rural settlements as the supply of housing land is restricted, and is likely to be a key reason for limited number of rural exception sites for affordable housing coming forward over the life of the UDP.

Furthermore, whilst providing clarity in relation on acceptable locations for most forms of development, especially housing, settlement boundaries should not be considered as a straitjacket to all forms of development. Policies in Planning Policy Wales and those in the UDP and subsequent LDP allow in principle, some forms of development on the edge of a minor villages which could be outside but adjacent to the development boundary such as affordable housing, community facilities and rural employment. Likewise it is not always the case that sites/proposals on land within a settlement boundary are suitable for development, which highlights the case that proposals for new development are not simply determined on whether a site falls with or outside a boundary drawn on map, they are considered within the wider context of the site itself alongside other factors such as character of the surrounding area or adjoining uses, and provision of safe and suitable access.

In light of these factors, the LDP has maintained settlement boundaries around the Key, Service Centre and Primary settlements which are the focus of the majority of development. For the Minor Rural Settlements, the LDP proposes criteria based approach for assessing future development proposals (Policy MD6- Development within Minor Rural Settlements). The aim being to give priority to housing allocations within the Key, Service Centre and Primary settlements, and for the minor rural settlements easing development pressures by allowing appropriate “windfall” to come forward, whilst safeguarding the countryside from inappropriate development.

In this regard, Policy MD6 maintains the need for the Council to restrict the inappropriate expansion of development in the countryside, and development which would have a detrimental impact on the existing settlement and the wider area and this is reinforced within criteria 1 through to 5. This is further reiterated at paragraph 7.30 which stated that:

“New development should therefore demonstrate a distinct physical or visual relationship with the structures that comprise the settlement. For example, new development should share an existing property boundary or be closely related to existing buildings so as to maintain and strengthen the settlement form. A strong visual relationship is also important, and proposals for new buildings that are divorced or unrelated to the existing properties or settlement or which present an incongruous or large scale extension will not be permitted”

Indeed the criteria contained within Policy MD8 has been developed to reflect the material considerations that the Council would consider if settlement boundaries were maintained, since each development proposal is considered on its own merits, and not simply on whether a proposal is in or outside the settlement boundary. Indeed, it should be noted that UDP Policy HOUS2 allows for appropriate small scale development adjacent to settlement boundaries and assessed against a criteria based policy- which the Council considers has been significantly enhanced within Policy MD8 of the Deposit LDP.

Therefore, the Council is of the view that the criteria based policy adopted through policy MD6 shall maintain the rationale of settlement boundaries without the need to draw boundaries around settlements, whilst allowing for appropriate small scale development within minor rural settlement to be considered on individual merit. This in turn the Council considers will allow the character of existing settlements to be safeguarded and also assist in addressing meet local housing needs in rural villages, thereby supporting their longer term viability.

- **Lack of safe walking and cycling provision outside of the village and no public transport provision for Ystradowen**

The Infrastructure Plan sets out the infrastructure requirements arising from the new residential developments. Appendix 1 (p87) highlights the new infrastructure required for site MG2(45) which includes the provision for sustainable transport including local cycling and walking links, a new crossing on Cowbridge Road, upgraded bus stops and contributions towards the local bus services.

Additionally in granting permission for outline permission on part of the site now as Land at Badger's Brook, the Council secured planning contributions for sustainable transport improvements, and further contributions would be sought from additional development proposals on the remaining area of land allocated under MG2 (45).

- **Additional housing shall increase the number of car journeys, create additional congestion, and increase the use of rural roads as "rat runs"**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **Access via Badgers Brook and Sandy Lane are wholly unsatisfactory due to the current excess traffic, narrowness of existing roads, and poor visibility**

These matters have been considered as part of the determination of the current approved outline planning permission.

- **The allocation is prone to flood risk and development would exacerbate the situation**

In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding. In respect of allocation MG2 (45) NRW have not raised any objection to the proposals.

- **The proposal to remove residential settlement boundary will further increase development pressures**

on Ystradowen and other rural villages

Please refer to Council's response to representations made on LDP Policy MD5 Development in Key, Service and Primary Settlements

- **The proposal shall place pressure on existing school provision**

Alongside the production of the LDP, the Council has produced its Draft Infrastructure Plan and is supported by a series of associated background papers. This identifies the necessary infrastructure requirements to support the proposed level of housing growth within the LDP, and assesses the infrastructure requirements for each housing allocation within the LDP to enable the Council to seek contributions towards new or enhanced provision. In respect of additional demand on schools, the Infrastructure Plan identifies a requirement for a further 46 pupil places arising from housing allocation MG2 (45). Any future development will be required to contribute towards meeting this requirement; to date the Council has secured education contributions associated with the outline approval of Land at Badgers Brook equivalent to the provision of 20 pupil places. Accordingly, the Council is of the opinion that any additional demand on school places generated by MG2 (45) shall be met by developer contributions.

- **Challenge the findings of the Council's Sustainable Settlements Background Document identifying Ystradowen as a sustainable location for future housing development- scoring the lowest sustainability score of all minor rural villages**

A general response to this issue is contained in paragraph 3.1.9. Within the hierarchy, Ystradowen is categorised as being a minor rural settlement alongside 23 other rural villages within this category reflective of the range of service within this category. Within the Minor Rural Settlement category there is a broad spectrum of settlements, in terms of spatial size and resident population and as such the number of dwelling proposed within each settlement has been made in with regard to the physical capacity alongside environmental and infrastructure characteristics.

- **The Council's Community Facilities Background Paper has not identified any requirement for the provision of new community facilities to support the proposed development which are much needed**

The Council's Community Facilities Background Paper (Submission Document No. 42) examined the need for additional leisure, library and community buildings as a result of future housing development. This assessment concluded that the housing allocation MG2 (45) would not generate additional demand for community building space but a contribution to sports provision would be required.

The Infrastructure Plan sets out the infrastructure requirements arising from the new residential developments. Appendix 1 (p87) highlights the new infrastructure required for site MG2 (45) which includes the contributions for sustainable transport, enhancements to the local library, built sport facility, additional school places as well as provision of on-site open space and play area.

Site MG2-46 Land West of Swanbridge Road, Sully

Representor ID and Name

ID-483/1/1	ID-5442/1/1	ID-5814/1/1
ID-483/2/1	ID-5446/1/1	ID-5820/1/1
ID-697/1/1	ID-5447/1/1	ID-5822/2/1
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Summary of the Grounds of Objection

- Highway Safety would be compromised - current concerns over existing highway safety
- Insufficient Highway Capacity - existing provision is inadequate locally and at key junctions (Merrie Harrier, Barons Court)
- Increased air pollution and noise as a result of additional traffic and congestion
- The proposal would increase pressure on existing limited services and facilities
- The development site lies outside the residential settlement boundary for Sully – contrary to LDP Policy MG3
- Adverse impact on ecology and nature conservation
- Loss of green fields and agricultural land grade 3a
- Loss of existing residential amenity
- Contrary to the Human Rights Act – Protocol 1 – the right to peaceful enjoyment of their possessions

including home and other land.

- Negative impact on the livelihood of the tenant farmer
- Adverse impact on the historic environment - Cog Conservation area, the setting of listed buildings and loss of areas of archaeological importance
- The proposed development would disproportionately increase the size of Sully by approximately 1/3rd and would have a negative impact on the existing community
- Sully is not a sustainable location for housing - inadequate public transport provision, and local employment placing greater reliance on car journeys
- Drainage and sewage problems - existing provision is already at capacity
- Increase flood risk locally from potential run off as a result of the loss of green fields
- The site is not required- the Council has over estimated its housing requirement for the LDP
- Proposed density of the development is excessive and would not provide adequate amenity space for future residents
- Existing local schools are at capacity and would not cope with the pressure from additional housing
- Impact on local amenity during the development of the site
- Need to secure required infrastructure requirements and community facilities to accommodate additional developments prior to the commencement of any development in Sully
- The significant level of social housing proposed would change the status of the village into a town
- No consideration to the mix of housing proposed - lack of provision for elderly residents
- Devaluation of house prices

Council Response

- **Highway Safety would be compromised- current concerns over existing highway safety**

Any future development proposals would be required to provide safe and appropriate highway access for all users, alongside planning contributions towards the provision of walking and cycling facilities. Deposit LDP Policy MD4 Community Infrastructure and Planning Obligations sets out the Council's planning requirements in relation to the contributions the Council shall require as a result of new housing proposals.

- **Insufficient Highway Capacity-existing provision is inadequate locally and at key junctions (Merrie Harrier, Barons Court)**

A general response to this issue is contained in paragraph 3.1.1. The Highway Impact Assessment Background Paper examined the potential increase in road use as a result of the planned housing developments identified within the Deposit LDP including peak hour capacity of all main and arterial highway routes and junctions directly associated with the housing proposals. As a result of this assessment, the Council is of the opinion that representations raising concerns relating to increase in traffic congestion have been assessed. The Council shall seek to ensure that future development mitigates any possible adverse impacts associated with an increase in traffic.

- **The proposal would increase pressure on existing limited services and facilities**

A general response to this issue is contained in 3.1.3. Appendix 1 (p88) of the Infrastructure Plan sets out the planning requirements for the site MG2 (46) including contributions for improved sustainable transport, additional schools places, a new on-site play area and on-site community facilities and built sports facilities.

The Infrastructure Plan also considers the provision of additional health and medical facilities, which whilst not directly the responsibility of the Council, the LDP allocates land for the new and enhanced health facilities. The Council has worked with the Cardiff and Vale University Health Board to identify area where additional

medical facilities would be required over the plan period. In Penarth some GP practices are operating at or near full capacity so investment will be needed to manage the increased demand. This may include improvements to the following practices: Stanwell Road Surgery, Redlands Road Surgery, Sully Surgery, Albert Road Surgery and Station Road Surgery.

- **The development site lies outside the residential settlement boundary for Sully – contrary to LDP Policy MG3**

Settlement boundaries were originally defined by the Council for the purpose of managing development during the UDP lifetime, and the permanence of these designations is limited to the lifetime of the UDP, and will always be subject to potential change. For the LDP, where settlement boundaries have been defined, the Council has redrawn settlement boundaries to follow the boundary of these housing allocations.

- **Adverse impact on ecology and nature conservation**

A general response to this issue is contained in paragraph 3.1.6. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding alongside potential impacts on ecology. In respect of allocation MG2 (46) NRW have not raised any objection to the housing allocation in relation to nature conservation issues.

- **Loss of green fields and agricultural land grade 3a**

A general response to this issue is contained in paragraph 3.1.5. The area of land classified as being grade 3a agricultural land is omitted from the area covered by the proposed housing allocation MG2 (46). This is confirmed by the Welsh Government who commissioned an agricultural land quality survey of the site.

- **Loss of existing residential amenity**

Future development of the site would be required to ensure that the residential amenity of existing residents is protected in accordance with LDP Policies MD2 (Place Making) Criterion 7 and MD 3 (Design of New Development) Criterion 4.

- **Contrary to the Human Rights Act - Protocol 1 – the right to peaceful enjoyment of their possessions including home and other land.**

The role of planning is to control the development and use of land in the public interest so that it does not adversely impact on the amenities of the wider public and so local land use needs can be met. The allocation of land for development in itself is not considered to be contrary to the Human Rights Act as suggested by the representor. The Council in its capacity as the Local Planning Authority will be required to ensure that consideration is given to any impacts generated by the proposed development on existing amenity, alongside any other material considerations. It is considered that in identification of the site allocation and in the carrying out of its statutory duties the Council would satisfy the need to balance the rights and freedoms of individuals against the wider interest of the community as required by the HRA.

- **Negative impact on the livelihood of the tenant farmer**

The Council accepts that the potential development of the site would have an impact on the operation of the tenant farmer. However, representations submitted on behalf of the tenant farmer (Representation 6029/1/1) do not indicate that the business would not remain financially viable. Therefore, the site is considered that the site allocation is justified in that it would meet local housing needs and represents a logical extension to the

settlement.

- **Adverse impact on the historic environment – Cog Conservation area, the setting of listed buildings and loss of areas of archaeological importance**

A general response to this issue is contained in paragraph 3.1.7. It is the Council's opinion that any development proposal would be required to fully consider the setting of the Conservation area and listed buildings.

In respect of archaeological interests, in preparing the Deposit LDP, the Council consulted with Glamorgan Gwent Archaeological Trust on all the proposed housing allocations. No objections to development have been raised on the sites listed in policy MG2, and have advised that in respect of MG2(46), GGAT have advised that:

"Extensive archaeological evaluation will be required prior to any positive determination of planning applications. Areas can be allocated in LDP with proviso that certain parts may need to be retained as open space in order to protect archaeological features."

- **The proposed development would disproportionately increase the size of Sully by approximately 1/3rd and would have a negative impact on the existing community**

In meeting the identified LDP housing requirement, the Council has sought to distribute housing across the settlement hierarchy in a manner that reflects the role and function of each category of settlements identified within the settlement hierarchy. This approach is reflected in the level of growth apportioned to each settlement category in the hierarchy, as highlighted within the Housing Land Supply Background Paper (2013). The Council considers that on the basis of housing numbers alone, the level of housing proposed for Sully is appropriate in terms of its role as a Primary Settlement. It is considered that the distribution of housing in the Deposit LDP is appropriate given the housing need across the Vale of Glamorgan and that this is consistent with LDP Strategy to focus development within the South Eastern area of the Vale of Glamorgan, the St Athan area and development within other sustainable settlements.

- **Sully is not a sustainable location for housing - inadequate public transport provision, and local employment placing greater reliance on car journeys**

The LDP Settlement Hierarchy ranks the towns and villages within the Vale of Glamorgan in a manner which reflects the level of services and facilities each settlement offers, and the categories of settlements within the hierarchy generally reflecting their individual role based on the geographical areas they serve. The aim of establishing a settlement hierarchy is to promote sustainable communities where new development is located close to services and facilities with good public transport links. By locating housing, jobs and services close together, the need for travel will be reduced and the ongoing prosperity of existing settlements will be supported.

In establishing the LDP settlement hierarchy, the Council undertook a Sustainable Settlements Appraisal (SSA) of all settlements within the Vale of Glamorgan using a range of key sustainability measures developed by the Council, and reflected the general principles set out in national planning policy. Using these measures, the review involved an audit of the services and facilities within each settlement, and a system of scoring that ranked each settlement according to the level of services available within each against the key sustainability measures. Secondary data was also gathered to further expand upon availability of the services and facilities such as bus timetables and school catchments. Further details on the methodology and findings are set out in the Council's Sustainable Settlements Appraisal Background Paper (2013).

Within the hierarchy, Sully is categorised as being a Primary Settlement alongside, Llandough, Rhoose, St Athan and Wenvoe category reflective of the range of services within this category. In this regard the Council is of the view that the identification of the LDP settlement hierarchy reinforces its established role as a settlement suitable for accommodating additional growth, and is based on a sound assessment of the level of services available alongside its functional relationship with other settlements identified within the hierarchy.

- **Drainage and sewage problems - existing provision is already at capacity**

In preparing the Deposit LDP the Council consulted with Dwr Cymru Welsh Water (DCWW) on the necessary infrastructure requirements to support the levels of development proposed within the LDP.

In respect of allocation MG2 (46) Dwr Cymru Welsh Water have not raised any objection to the proposals but have submitted the following site specific commentary-

"A hydraulic modelling assessment will need to be undertaken to understand where the development can connect to our water supply. The local sewer network in this area is too small to accommodate the foul flows from a development of this size. An assessment of the sewer network will be required to establish the point of connection to the public sewerage network. Potential developers need to be aware that the site is crossed by 150mm diameter rising main through the centre. This main may restrict the amount of density proposed and a protection measure in the form of easement width or diversion of the pipe is required.

Our Cog Moors Waste Water Treatment Works has limited capacity and dependent on the pace and build rate of new properties, there will ultimately be a time when increased capacity is required. Our current Asset Management Plan to year 2015 does not include improvements to this Waste Water Treatment Works."

In light of the comments provided by DCWW, the Council is of the opinion that the necessary infrastructure can be provided to serve the development.

- **Increased flood risk locally from potential run off as a result of the loss of green fields**

A general response to this issue is contained in paragraph 3.1.4. In preparing the Deposit LDP the Council consulted with Natural Resources Wales to identify any potential issues associated with flooding and the risk of flooding alongside potential impacts on ecology. In respect of allocation MG2 (46) NRW have not raised any objection to the housing allocation in relation to flooding matters.

- **The site is not required- the Council has over estimated its housing requirement for the LDP**

Following the publication of the latest population and household projections, the Council has undertaken a review of its housing requirement over the LDP period. Further information on this is set out in the Housing Provision Background Paper (2015). On the basis of the review the Council is of the opinion that the deposit LDP has made adequate provision to meet the identified housing requirement over the plan period, alongside the need to ensure sufficient flexibility over the plan period through the identification of site MG2 (46) as a housing allocation, rather than a reserve allocation as promoted in the DLDP.

- **Proposed density of the development is excessive and would not provide adequate amenity space for future residents**

The Council has calculated the dwelling capacity of the site at 25 dwellings per hectare which is below the 30 dwellings per hectare required by Policy MD7 for Primary Settlements. This generally reflects the density of

development within the area alongside the needed for the development to provide community infrastructure. Accordingly the Council considers that the proposed dwelling number identified is appropriate for the site allocation.

- **Existing local schools are at capacity and would not cope with the pressure from additional housing**

Alongside the production of the LDP, the Council has produced its Draft Infrastructure Plan and is supported by a series of associated background papers. This identifies the necessary infrastructure requirements to support the proposed level of housing growth within the LDP, and assesses the infrastructure requirements for each housing allocation within the LDP to enable the Council to seek contributions towards new or enhanced provision. In respect of reserve site MG2 (46), should the site be developed during the plan period, the Infrastructure Plan identifies that this would generate a requirement of 163 additional pupil places, which would be provided by the developer through appropriate planning obligations.

- **Impact on local amenity during the development of the site**

The Council acknowledges that during the construction stage there would be some disruption caused, however, it is not considered that this would fundamentally or unacceptably impact upon neighbouring properties, it is considered that such impacts are in many cases an unavoidable consequence of a development but can be controlled through planning conditions and through appropriate site management.

- **Need to secure required infrastructure requirements and community facilities to accommodate additional developments prior to the commencement of any development in Sully**

Additional necessary infrastructure to support the proposed development would be secured as part of approval of any housing development, not prior to any proposals

- **The significant level of social housing proposed would change the status of the village into a town**

The Vale of Glamorgan 2010 Local Housing Market Assessment (LHMA) provides the most up-to-date assessment of housing needs within the Vale of Glamorgan and identifies an overall affordable housing need of 915 affordable dwellings across the Vale of Glamorgan over the period 2010 to 2015. Table 6.13 shows the geographical distribution of affordable housing requirements across the Vale of Glamorgan's housing market areas. For the Penarth sub-market housing area, which includes Sully, the LHMA identified a requirement of 153 affordable dwellings per annum or 16.6% of the overall need. Therefore, there is considered to be a significant housing need within the area which needs to be met in appropriate locations.

Sully is located within the LDP Strategy "South East Zone" and has been identified as a Primary settlement within the LDP Settlement Hierarchy, which has been informed by an assessment of the sustainability of settlements considering a number of factors, including proximity to public transport and a range and choice of services and facilities. Further details can be found within the Sustainable Settlements Appraisal review background document (2013). Whilst Sully has been identified as an appropriate location to meet local development needs LDP policies have also identified a residential settlement boundary and green wedges adjoining Sully to manage future development pressures within the area.

Other residential site allocations have been identified within the South East Zone, totalling 3505 dwellings or 45% of the overall LDP site allocations. This site will help to meet the identified local housing needs and will contribute 14% towards the housing provision made within the South East Zone Strategy area and 0.06% of

the overall site allocations. This site has also been assessed as a candidate site by the Council and is considered to be a realistic and deliverable residential site allocation capable of being delivered during the Plan period.

Consequently, the Council considers that there is sufficient evidence to justify a requirement for the level of provision identified within Sully. Whilst the evidence is not specific to individual settlements, it is considered that the housing allocation MG2 (46) is appropriate and will contribute towards meeting local housing needs within the wider Eastern Vale, reducing the need for existing residents and new households to meet their housing requirements elsewhere.

- **No consideration to the mix of housing proposed - lack of provision for elderly residents**

Future development of the site would be required to ensure that there is an appropriate range and mix of housing to meet the needs of existing and future residents. In term of elderly residents this could be provided in the form of smaller dwellings, social housing and supported/sheltered housing accommodation.

- **Devaluation of house prices**

This is not a planning issue and therefore not a matter for the LDP to address.

Policy MG 5 – Gypsy and Traveller site

Summary of Issues raised:

- Point 1 - Health & Safety concerns in relation to the sites proximity to Dow Chemicals HSE Zone
- Point 2 - Loss of public open space
- Point 3 - Impact on sensitive neighbours e.g. Beechwood College and Ty Hafan hospice
- Point 4 - Site not suitable for Gypsy & Traveller site
- Point 5 - Impact on leisure and tourism e.g. use of slipway and coastal path
- Point 6 - Lack of consultation
- Point 7 - Impact on local property prices
- Point 8 - Effect on residential and commercial developments viability
- Point 9 - Site dimensions too small for needed No. of pitches
- Point 10 - Community need for allotments
- Point 11 - Top of site within C2 flood zone
- Point 12 - Access problems to Slipway and Hayes Road
- Point 13 - Outside settlement boundary
- Point 14 - Site proximity to and impact on coastline
- Point 15 - Increase in crime
- Point 16 - Lack of evidence base in Gypsy and Traveller Accommodation Need Background Paper
- Point 17 - Lack of adequate facilities and infrastructure for the site
- Point 18 - Impact on Wales Coastal Footpath
- Point 19 - Land East of Llangan (ID: 24) considered a more suitable site
- Point 20 - Clarify identified gypsy and traveller need
- Point 21 - No transit provision has been made for Gypsy and Travellers
- Point 22 - Highways impact from the proposed gypsy and traveller site
- Point 23 - Current status of the site
- Point 24 - Clarity regarding the funding and delivery of a Gypsy and Traveller site
- Point 25 - Clarify within the LDP that different groups of travellers will not share sites

Representor ID:

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Council's Response:

- **Point 1 - Health & Safety concerns in relation to the sites proximity to Dow Chemical's HSE Zone**

Health & Safety - When considering the development of sites in close proximity to hazardous installation the Council undertakes consultation with the Health and Safety Executive (HSE). The HSE have developed a methodology and software decision support tool called Planning Advice for Development near Hazardous Installations (PADHI+) which is available to all planning authorities to provide consultation responses regarding these issues. Using the prescribed PADHI+ development parameters to assess the gypsy and traveller site proposal at Hayes Road, the HSE PADHI+ returned DAA [Do Not Advise Against] the development, the assessment of course being subject to formal consultations as a part of a full planning application. The Council is therefore of the opinion that the health and safety issues raised by representors have been adequately considered at this stage and further investigations and consultations will be undertaken when more detailed proposals are available. No change to the LDP in this respect is therefore considered necessary.

- **Point 2 - Loss of public open space**

The area to the rear of the Hayes Road Civic Amenities is considered to be informal public open space (or amenity space). Whilst its loss is regrettable, the Council is required to take a balanced approach when assessing the merits or otherwise for various competing land uses to meet identified land use needs. The Open Space background paper identifies that there is sufficient provision of incidental open space within the area against the relevant Fields in Trust (FIT) standards. Therefore, in considering the competing land use needs and in assessing the site, it is the Council's view that the use of the Hayes Road, Sully site to meet local Gypsy and Traveller accommodation needs is appropriate and the protection of the site as informal open space is not required. Section 123 of the Local Government Act 1972 applies generally to the disposal of land by local authorities, whereas section 122 applies generally to the appropriation of land from one purpose to another. There are certain requirements placed on the Council in order to comply with the relevant procedures in appropriating land from one purpose to another under section 122 as there are under section 123 when disposing of land. There are also further requirements when appropriating land that is open space to another function (see section 122(2A)). A similar provision exists in section 232(4) of the Town and Country Planning Act 1990. However, neither section 122 or 123 of the Local Government Act 1972 or section 232(4) of the Town and Country Planning Act 1990 negate the proposed use of the Hayes Road site so long as the correct procedures are followed.

- **Point 3 - Impact on sensitive neighbours e.g. Beechwood College and Ty Hafan hospice**
- **Point 4 - Site not suitable for Gypsy and Travellers**
- **Point 5 - Impact on leisure and tourism e.g. use of slipway and coastal path**
- **Point 8 - Effect on residential and commercial developments viability**
- **Point 9 - Site dimensions too small for needed No. of pitches**
- **Point 13 - Outside settlement boundary**
- **Point 14 - Site proximity to and impact on coastline**
- **Point 15 - Increase in crime**
- **Point 17 - Lack of adequate facilities and infrastructure for the site**
- **Point 18 - Impact on Wales Coastal Footpath**

Many site specific objections raised concerns with regard to the potential adverse impact that the accommodation of Gypsy and Travellers would have on neighbours (for example, Beechwood College), general local amenity and health and safety. Similarly, concerns were raised over the lack of appropriate infrastructure at the site for the proposed users and the impact on existing infrastructure such as drainage and highways. The Council considers that these are matters which could be addressed at the planning application

stage and through detailed and sympathetic site design and management of the site in accordance with Welsh Government guidelines and best practice for gypsy and traveller sites. Health and safety and crime will be considerations in the detailed design and ongoing management of the site. Likewise where there are instances of crime this would be addressed by the Police and local law enforcement agencies as and when necessary.

Site specific objections have also raised concerns regarding the suitability of the site when considering a number of other issues such as the ability of the site to accommodate the identified needs, the potential impact on tourism and the impact on other surrounding land uses. In this respect, policy MG5 of the Deposit LDP has identified the site at Hayes Road to meet the accommodation needs of Gypsy and Travellers over the plan period. The allocation of the site is based on the evidenced need identified in the Gypsy and Travellers Accommodation Needs Assessment (Sept 2013) and on the Gypsy and Traveller Site Assessment background paper (Sept 2013). In allocating the site the Council has considered the relevant planning merits of the site and the potential impacts that its development would have on adjacent land uses, access to services, environmental constraints and other planning designations. This assessment has concluded that the allocation is appropriate for the proposed use of the site. Further details regarding these issues are provided in the appropriate background papers. A number of representations also commented on the need to consider other alternative sites. The Council has considered other potential sites, such as land East of Llangan, and further details of these assessments are provided within these background papers. Notwithstanding this it is considered that the detailed issues raised can be addressed through sensitive site design and appropriate site management arrangements. No change to the LDP in respect of these issues is therefore considered to be necessary.

- **Point 19 – Land East of Llangan (ID:24) considered a more suitable site**

The evidence concerning the allocation of the Hayes Road site in policy MG 5 is contained within the Council's Gypsy and Traveller Site Assessment background paper (September 2013) which concludes that the site at Hayes Road is the most suitable to accommodate the identified needs of the gypsy and traveller community within the Vale of Glamorgan. A number of representations make reference to previous and superseded assessments which have been updated and revised as part of the evidence base for the Deposit LDP. Clarity on the identified need for gypsy and travellers in the Vale of Glamorgan can be found in the Gypsy and Traveller Accommodation Needs Assessment (September 2013).

- **Point 16 - Lack of evidence base in Gypsy and Traveller Accommodation Needs background paper**
- **Point 20 - Clarify identified gypsy and traveller need**
- **Point 21 - Lack of Transit Provision**

The ORS GTAA identified a need to provide for a total of 18 additional pitches in the Vale of Glamorgan to 2026 based on the evidence that was identified during the study period in 2013. This included meeting the needs of 17 unauthorised households living on the Hayes Road site in Sully and 1 unauthorised household living at the site in Twyn Yr Odyn (which has recently been granted temporary consent at Appeal).

Based on the resident demographics identified during the fieldwork it was considered unlikely that any new households will be formed during the plan period and there was no evidence of movement from bricks and mortar or from in-migration. An assessment of the authorised site in Bonvilston and tolerated unauthorised site in Llangan suggests that any future growth on these sites can be met on site.

The Council have included Policy MG5 in the Deposit Local Development Plan which allocates land at Hayes Road, Sully for the provision of a Gypsy and Traveller Site in order to meet the evidenced need.

Due to the GTAA being unable to capture detailed information about all households living in the Vale of Glamorgan it made clear that the need figure of 18 additional pitches was based on the needs of identifiable

households and that this would provide for short to medium term needs. It went on to recommend that the Council follow principles that have been set in nearby Neath Port Talbot and continue to closely monitor the situation for the latter period of the Plan, allowing the Council to address clearly identified current needs, but giving them the flexibility to address needs which cannot be substantiated at this time.

Whilst this does meet the identified need from the GTAA it clearly does not meet any as yet unidentified need towards the latter periods of the Local Development Plan. However in the opinion of ORS it is often very difficult to provide a robust long-term estimate of need as local circumstances can change up to 15 years in the future. Therefore it is considered that by meeting the identifiable need and monitoring the situation with a view to additional provision, the Council will be able to meet need over the plan period to 2026.

It should also be noted that while a need of 17 pitches based on unauthorised households living on the site in Sully has been included, it is considered that the likelihood is that this figure is excessive given that many of the households currently living on the site have stated that they will vacate the site should planning permission be granted, and in the opinion of ORS others may fail to be classed as Gypsies and Travellers or New Travellers under the current definition set out in Circular 30/2007 if the site is formalised.

Therefore, while the comments of the Welsh Government are noted, the Council considers that the GTAA is clear in its intention to provide for current and medium term need, but would propose the inclusion of detailed indicators and triggers within the Monitoring Framework to ensure that the identified need over the plan period is addressed. Notwithstanding the above, the Council proposes to amend paragraph 6.43 to further clarify the identified need during the plan period.

The GTAA identified an overall need for the Council to provide a total of 18 additional pitches. This was based on 17 households at the Hayes Road site in Sully and 1 household at the unauthorised site at Twyn Yr Odyn.

The status of the residents at the Twyn Yr Odyn site has been established a recent planning appeal for the site. However the status of the households living at the site in Sully is harder to establish. Interviews with site representatives indicated that they are a mixture of New Travellers and Travelling Showpeople but as the Council's consultants ORS were unable to speak with all of the households it was not possible to provide a more detailed split. Also in the opinion of ORS some may even fail to be classed as New Travellers or Travelling Showpeople under the current definition set out in Circular 30/2007.

Notwithstanding the above and given the broad definition of gypsy and travellers under Circular 30/2007, the Council considers that at this time it is appropriate to seek to provide for the upper figure as determined by the ORS study rather than to underestimate requirements. The Council is required to keep the current situation under review and should more detailed information become available, the need figure will be adjusted accordingly. This can be monitored through LDP Annual Monitoring Reports and the inclusion of proposed monitoring targets.

The Council's needs assessment indicates an irregular and low level of travelling through the Vale of Glamorgan at a variety of locations. Notwithstanding this and following wider consultations, the study concludes that there would appear to be a gap in provision for a suitably located and publicly provided transit site or emergency stopping place of around 10 pitches near the M4 which would not necessarily fall within the Vale of Glamorgan. This conclusion has been accepted by the Council and it is the Council's intention to work with its neighbouring authorities on a regional basis to identify and develop a suitable site to accommodate the identified need for a gypsy and traveller transit site. To this end, the Council would propose that suitable indicators and trigger points relating to the provision of transit accommodation (as necessary) are included within the Monitoring Framework to ensure that such provision is realised.

- **Point 6 - Lack of consultation**

The LDP has been subject to the statutory 6 week public consultation as set out in the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. Further the consultation exercise has been undertaken in accordance with the contents and mechanisms set out in the Council's approved Delivery Agreement. The Council therefore considers that appropriate measures have been taken to publicise the Deposit LDP, to engage with local residents and to provide a variety of ways in which to comment on the content of the Deposit LDP. For clarity, interviews undertaken for the Gypsy and Traveller Accommodation Needs Assessment were to gather evidence and establish potential local accommodation needs in accordance with the methodology set out in the needs assessment. Formal public consultation on the LDP proposals has been undertaken as set out under the LDP Regulations and Delivery Agreement.

- **Point 7 - Impact on local property prices**

The potential impact upon local property prices is not an issue for consideration within planning processes and/or the Local Development Plan.

- **Point 10 - Community need for allotments**

Many representors have suggested that the former civic amenity site would be better utilised to address a shortfall of community allotments within the local area. In this regard, whilst there are no formal national standards regarding the provision of allotments the Council accepts that there is a general under provision of allotment gardens throughout the Vale of Glamorgan. In response the Council has committed in its current Allotments Strategy to undertaking a needs assessment by ward and to develop additional sites across the Vale of Glamorgan where required. The site at Hayes Road, Sully does not have a statutory classification as an allotment. The site remains a part of the local authority's general property portfolio and no commitments over its future use have been made by the Council. Therefore, reference to various historic acts that provide protection for allotments have no bearing on the proposed site allocation in the Deposit LDP. No change to the LDP in this respect is therefore considered necessary.

- **Point 11 - Part of site within a C2 flood zone**

The Council is aware that a small area of land has been identified as lying within a C2 flood zone as identified by the Welsh Government's Development Advice Maps (DAM). The area susceptible to flooding is located along the northern boundary of the site adjacent to Hayes Road and measures approximately 0.18 hectares. The Lavernock Point to St Ann's Head Shoreline Management Plan (SMP2) identifies the area under Policy Unit 1.5 (PU1.5) and for management purposes and recommends that management takes the form of 'No Active Intervention'. Notwithstanding the above, the SMP also identifies land susceptible to flooding during the extreme flood event, 0.1% annual probability of occurrence (1 in 1000yr return period). Whilst this risk is acknowledged it is considered that given the small area of C2 flood zone within the site and its location it is considered that there is sufficient scope to accommodate the proposed use and avoid conflict with flood risk.

In determining site size, the Council has utilised a larger than average pitch size which will enable some flexibility in site design and layout. It is considered that suitable site design, and if necessary minor mitigation measures, could adequately address or manage flood risk in accordance with section 7 and Appendix 1 of Welsh Government TAN15. While acknowledging the existence of C2 flooding on a small part of the site the Council considers that this can be adequately and appropriately managed and this would not prevent the use of the site by gypsy and travellers. In addition, it is noted that Natural Resources Wales has not raised any concerns within their representations regarding this proposed allocation. Therefore, the Council considers that the site is capable of meeting the identified needs contained within the ORS study and that no change is required.

- **Point 12 - Access problems to Slipway and Hayes Road**

The Council is aware that the Hayes Road Civic Amenity site is in close proximity to the Sully Slipway which is

used for both passive and active recreational seaside purposes and which provides 24 hour access to an "all tides" slipway for maritime emergencies. Notwithstanding this it is the Council's opinion that the use of the slipway will not be affected by the development of the Hayes Road Civic Amenity site to accommodate gypsy and travellers and that any issues will be addressed through sensitive design of the gypsy and traveller site and the appropriate management of both facilities. Therefore no change is considered to be required to the LDP.

- **Point 22 - Highway impact from the proposed gypsy and traveller site**

The Council considers that the local highway network within the vicinity of the Hayes Road site is appropriate to accommodate the proposed allocation although once detailed design has been completed; there may be a requirement for modest improvements to accommodate site lines etc. This would be considered as part of any detailed design at the planning application stage. This is in accordance with WG guidance which states proposals should not be rejected if they would give rise to only modest additional daily vehicle movements and/or the impact on minor roads is not significant (WAG Circular 30/2007).

- **Point 23 - Current status of the site**

Concerning the illegality of the current occupation of the site, the Council has stated that although the site is illegal it is classified as a tolerated but unauthorised site and as a consequence will not be enforced until the Council allocates a suitable site adequate to meet the needs of the gypsy and traveller community within the Vale. The word 'tolerated' is not utilised in the context suggested by representors but is a technical term utilised to clarify the status of an unauthorised encampment in relation to the obligations of the local authority. Paragraph 49 of the Welsh Governments Guidance on Managing Unauthorised Camping 2013 provides more details on this matter.

- **Point 24 - Clarity regarding the funding and delivery of a Gypsy and Traveller site**

In the current financial climate the Council is realistic in its approach to the funding of the future Gypsy and Traveller site at Hayes Road in that it would primarily look to the Welsh Government for support through the annual round of the Gypsy and Traveller Sites Capital Grant programme. This has been specifically developed to enable the development of new sites and to undertake refurbishment work at existing local authority Gypsy and Traveller sites across Wales. While the Council accepts that this is a relatively small funding stream when distributed across all 22 local authorities within Wales, it believes that it is the only significant funding available to develop a future Gypsy and Traveller site within the Vale of Glamorgan. The costs of delivering the scheme will become clear once detailed design of a Gypsy and Traveller site is undertaken. Provision of a Gypsy and Traveller site where there is an identified local need will become a statutory duty in Wales when the Housing Bill is introduced. While the Council's Capital Programme may also be a potential funding source, the contribution towards delivering such a scheme will need full consideration by the Council when the full extent of the site development costs are known.

- **Point 25 - Clarity within the LDP that different groups of travellers will not share sites.**

The ORS GTAA identified an overall need for the Council to provide a total of 18 additional pitches comprising 1 pitch located at Twyn Yr Odyn in Wenvoe and 17 pitches located at the unauthorised Hayes Road site in Sully. A recent planning appeal, which granted temporary use of the Twyn Yr Odyn site, established that the residents are appropriately classified as Gypsies. However, the status of the households living at the site in Sully is harder to establish. Interviews with site representatives indicated that they are a mixture of New Travellers and Travelling Showpeople but as the Council's consultants ORS were unable to speak with all of the households it was not possible to provide a more detailed assessment. Notwithstanding the above, the Council is aware of the issues in relation to different traveller groups co-habiting a single site which are clearly detailed in current Welsh Government advice and guidance on the development and management of gypsy and traveller sites. The Council therefore considers that the proposed amendment to paragraph 6.39 is unnecessary.

Officer Recommendation / Proposed Change	<p>Proposed change. Amend supporting paragraph 6.43 to read:</p> <p>6.43 Accordingly, the Plan allocates a single site at Hayes Road, Sully approximately 0.85Ha in size, which is considered sufficient as a whole to meet the identified need for the Plan. The site can be broken down into two parts, comprising the land formerly used as the Council's civic amenity site (approximately 0.21Ha) and open space land to the south (approx. 0.64Ha). It is considered that the short medium term need in the area can be met by the larger site to the rear, which should be provided in accordance with an agreed strategy in conjunction with the local Gypsy and Traveller Community, also retaining sufficient land to the south as a small landscaped area adjacent to the car park to ensure no detrimental impact on the car park. The smaller former amenity site should then be vacated (with existing travellers accommodated on the new site) but retained should it be required in future to meet identified long-term need during the Plan period.</p> <p>6.43 Accordingly, the Plan allocates a single site at Hayes Road, Sully of approximately 0.85Ha which is considered sufficient to meet the need identified over the Plan period. The site currently comprises two elements, the land formerly used as the Council's civic amenity site (approximately 0.21Ha) and open space land to the south (approx. 0.64Ha). Development of the site should be in accordance with the Welsh Governments latest guidance for Designing Gypsy and Traveller Sites in Wales and in consultation with the local Gypsy and Traveller Community.</p> <p>Amend Policy Target 23 to include additional targets to read: <u>Ability to meet Gypsy and Traveller needs identified in any updated accommodation needs assessment.</u></p> <p><u>Work with adjoining local authorities to identify a regional transit site by 2021.</u></p>
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