(ordered by Representation ID No.)

Representor ID and details: 4799/DP1 Catrin & Paul Da	vies						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	e Additional SA SEA		Rep format: Comment form	· · · · · · · · · · · · · · · · · · ·	our comments to be contact at a hearing session of	,	•
2a - Do you consider the LDP is Sound? Unsound	•	P1 - Unanswered	P2 - Unans	wered	swered C4 - Unans		hat it fails.
	Coherence and Effecti	iveness Tests - CE1	- Unanswered	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswere	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:	Cor	nstraints Map	Appendices:
				MG2(1 <mark>3)</mark>			
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your repr	resentation? Yes	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	oh: New Or Amended S Yes	Other (see No Unanswered	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amend	ed site, did you submit the Site Name: Land to w			` ' '	ase give the Candidate S a Site Reference	Site Name and refere: 2446/CS1, 2446	,
				-			

3e - Please set out your representation below:

Landscape:

The designated land is part of a Special Landscape Area, which in the Council's own words in policy MD1, "new development should not have an unacceptable impact on special landscape areas". How can a proposal to build one hundred "affordable" houses have an impact on land that has been awarded this status?

This land is currently a Greenfield Site outside the current settlement boundary of Cowbridge. How can the Council be permitted to build outside the settlement boundary, and why not propose a brown field site?

One hundred houses will not compliment the landscape and will be an eye sore to residents living in Hillside Drive and Crescent Close. The hedge that backs onto Brookfield Park acts as a green boundary obscuring the estate effectively. Due to the incline of the proposed site the creation of such a boundary would not be feasible. It would be a blot on the landscape for residents of Cowbridge and for visitors driving from St. Athan.

Congestion/Parking:

Vehicle congestion is already a huge problem in Cowbridge and with approximately one and hundred and fifty additional cars that would service such dwellings, it is only natural this would become an insurmountable problem for the town.

We strongly urge the Council to undertake a traffic survey at the traffic lights at 8.10am weekdays, during school term. Ordinarily one can wait twenty minutes to clear the traffic lights. Indeed it was brought to my attention by a member of the Chamber of Trade, that the last traffic survey conducted in Cowbridge was on a bleak day, at 2pm on a Tuesday afternoon when the High Street was covered in snow— hardly credible evidence on which to base planning proposals!

Even with the new development of Waitrose we will struggle for car parking, as it will be a condition of Waitrose that employees are not permitted to park in the spaces allocated to the store. Employees will therefore have to park in the main car park which is already at half full capacity by 8.30am in the morning. Indeed when the car park is at full capacity drivers migrate in desperation to nearby Middlegate Court where I have been informed vehicles have been vandalised by disgruntled residents fed up with their street being utilised as an overflow to the car park. Any planning proposal which potentially increases traffic or robs the town of much needed parking should be vetoed.

Access Issues:

St. Athan Road is a notoriously dangerous route. Contemplating accessing to a housing settlement off this road could potentially have fatal consequences, whilst also increasing the traffic on this famous road for stand offs. Twice in the last year I was witness to approaching vehicles refusing to reverse, and experienced the road rage that ensued.

Secondary emergency access through Windmill Lane or Bessant Close would devastate the neighbourhoods of many residents in Llanblethian. What is now a very peaceful and tranquil hamlet will be environmentally affected by noise and light pollution. Fear is that the Broadway could be used a short cut to Cowbridge or to Llantwit Major and other surrounding villages. Traffic calming studies have already been undertaken along this road, why compound this issue by potentially increasing the traffic along this road?

(ordered by Representation ID No.)

Representor ID and details: 4799/DP1 Catrin & Paul Davies

Recreational Use of Land:

The two pieces of land identified are used on a daily basis for recreation by individuals and families. Valeways have a public footpath running through this land. Should such a development be granted what happens to our entitlement to a "right of way"?

Hydrology/Hydrogeology:

Visibly from the top of Windmill Lane, the lower land of the proposed site is very saturated and boggy (even on a relatively dry day). Building on such land would certainly increase the surface run off from the land, compounding to already high saturation levels in the soil. Nature might assist by channelling the water to the nearby River Thaw, but what will this effect have on the river levels, especially for the dwelling of Llanblethian lower down stream, that have notoriously suffered the aftermath of floods from this river in the past?

Local Amenities:

As a family of two young boys, we are aware that both primary and secondary schools are already oversubscribed. How will these establishments accommodate larger intake figures?

We already have and average waiting time of two weeks for a scheduled doctor's appointment. One could foresee a situation where people would be forced to drive to their local hospital instead for consultations (a situation that we were faced with only a month ago, when we feared our youngest child had appendicitis).

Previous planning consultations on this land have identified that the sewerage works is already at full capacity and struggles to cope with even the existing volumes of effluent. Residents in Brookfield Park and properties along St. Athan Road regularly complain of smells from the works and sewerage related problems close to the vicinity of their properties.

Tourism:

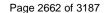
Does the Council not comprehend the phenomenal amount of Tourist income Cowbridge generates?

The market town is well renowned for attracting visitors due to its kudos and historical attractions. Visitors wanting to spend in the town will be turned away in their droves and Cowbridge's reputation as a once quaint market town will be decimated.

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

Propose candidate site removed and include as a green wedge to prevent further development considerations.

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



Representor ID and details: 4800/DP1 William Lambert							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form		our comments to be cat a hearing session of	•	•
2a - Do you consider the LDP is Sound? Unsound	•	Plan is unsound and do	es not not meet P2 - Unansv	` '	soundness, please inc	dicate which test(s) the	nat it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansv	vered C3 - Unans	wered C4 - Unai	nswered	
	Coherence and Effective	eness Tests - CE1 - U	nanswered	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswere	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph N	lumber:	Proposal Map:	<u>Cc</u>	onstraints Map	Appendices:
				MG2(1 <mark>3)</mark>			
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your repre	esentation? Yes	(If	"No" or "Unanswered	' - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	•	-	ew Paragraph: nanswered	Amended Paragrap Unanswered	h: New Or Amended Yes	Site: Other (see No Unanswered	tes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	•	e site as a Candidate Sitest of St Athan Road Llar		` '	se give the Candidate Site Referen	Site Name and refer ce: 2446/CS1, 2446	,
3e - Please set out your representation below: LDP Objection MG2(13)							
I am opposing the proposal to build 100 houses plus on for Both my wife and myself feel that further development will Cowbridge is already overrun by traffic and with the coming I disagree on the grounds already mentioned, i.e. traffic, so	I spoil the natural countrying of Waitrose alone will	yside. make it a nightmare.	t town will be ruir	ned with this new sche	me and character take	en away.	
3f - Please outline the changes you wish to see made to the D Have candidate site removed and include as a green wed		,	S.				
4b - If you wish to speak, please confirm which part of your re	presentation you wish to	speak to the inspector a	bout and why the	ey consider it be neces	ssary to speak at the h	earing -	

Representor ID and details: 4802/DP1 Mrs Sharon Dray	on
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Letter you want to speak at a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
Ba - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(19). MG2(20).
Bb - Do you wish to see any changes made to the Deposit Plar	
3c - What changes would like to see made to the Deposit Plan	New Policy: Amended Policy: New Paragraph: Amended Paragraph: Unanswered Unan
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Site Reference:
grandchildren's school in Cogan already takes me 20 to 2 Cardiff Road and indeed the Murch Road Bridge are a nig is inconceivable. With all the extra housing at Rhoose, Su We need a fly over or bypass well before we need any mare not equipped and neither are the medical facilities for What about St. Cyres school? Why tear down a perfectly get through Cardiff Road, it would become almost life three Another worry is public transport, how on earth would it compty??) and the poor buses would still be stuck in the transport for other people. I bet this plan is nowhere near their homes!!!	d at the above proposals for more housing in this area. The main Cardiff Road is constantly busy and extremely so at rush hours. Just to get to my 5 minutes, where it should only take about 5 minutes. Coming home after school takes a good 30 minutes. In the above proposals for more housing in this area. The main Cardiff Road is constantly busy and extremely so at rush hours. Just to get to my 5 minutes, where it should only take about 5 minutes. Coming home after school takes a good 30 minutes. In the above proposals for more housing in this area. The main Cardiff Road is constantly busy and extremely so at rush hours. Just to get to my 5 minutes, where it should only take about 5 minutes. Coming through Dinas Powys it's a wonder that the road hasn't already collapsed. In the housing or traffic. Also the amenities here are not sufficient to support an extra 400 houses full of families. The schools are not equipped, the shops the amount of people that these houses would generate. In the amount of people that these houses would generate. In the school when all that is needed is a little money to update the existing one? What a waste! As for Ambulances, police cars etc. trying to attending, because the money wasted on a bus lane near the Merry Harriers is a just that a total waste of taxpayers' money!! In the are only ever two carriages on the railway line at peak hours now, (though we often see four or more later in the day which are mostly affic, even if more were provided. In my minds eye, whoever came up with this ridiculous plan is obviously either a fool or someone who has no regard the highway structure and it is NEEDED NOW!
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 4803/DP1 Mr L E Taylor			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		to be consiered by 'written representations' or do ession of Public examination? Written
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound and d Procedural Tests - P1 - Unanswered	loes not not meet one or more test(s) of soundness, ple P2 - Unanswered	ease indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered C4	- Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Unanswered CE2 - Unanswered CE3 - Unans	wered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph	Number: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan'		New Paragraph: Amended Paragraph: New Or An Unanswered Yes	nended Site: Other (see Notes): Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate S Site Name: Land beneath Cowbridge bypass		ndidate Site Name and reference if known) Reference: 2252/CS.5
3e - Please set out your representation below: Candidate site 2252/CS.5 has been excluded from the drawis access via Middlegate Court estate. If so, this could be Such measures would both facilitate access to the viaduo	easily overcome by double yellow lining the ac	cess road from Town Hall Square up to the start of the	houses and then limiting parking to residents.
The fact that the candidate site is within the flood zone is	no longer relevant given the provision of major f	lood mitigation works.	
There is an "overflow" from the Town Hall car park on ever	ry weekday and candidate site 2252/CS.5 would	d provide a solution by allowing the construction of a d	esignated overflow car park.
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector	about and why they consider it be necessary to speak	at the hearing -

Representor ID and details: 4804/DP1 Rhidian Evans			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		our comments to be consiered by 'written representations' or do at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 -	P2 - Unanswered C2 - Unanswered C3 - Unans	soundness, please indicate which test(s) that it fails. wered C4 - Unanswered CE3 - Yes CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph MG2(11). MG12(11). MG15	Number: Proposal Map:MG2(11)	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your representation? Yes	(If "No" or "Unanswered	- go to 3d)
3c - What changes would like to see made to the Deposit Plan		New Paragraph: Amended Paragrap Unanswered Unanswered	h: New Or Amended Site: Other (see Notes): Yes Unanswered
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate S Site Name: Cowbridge Cattle Market ¬- Land		se give the Candidate Site Name and reference if known) Site Reference: 178/CS1 2440/CS2
3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market has	been allocated for residential development. This	is is unsound and objected to on the gro	unds that-
The Cowbridge Cattle Market, which sells on average over	er500 head of sheep per week, is trading succes	ssfully and supporting the farming comm	unity of the Vale of Glamorgan and should not be closed.
			all which would hold approximately 25 cars, no provision has been munity in Cowbridge and the attractiveness of Cowbridge as a
Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.	r the replacement cattle market. This is a green	field site and proposals are made within	the LDP for its purchase and development as a market. The
3f - Please outline the changes you wish to see made to the Delete Policies MG2 (11), MG12(11) and MG15. An additional policy should be includiedupholding the conon the site to support the attractiveness of Cowbridge as	tinuation of the Cowbridge Cattle Market in sup		ale of Glamorgan and the provision of improved parking facilities
4b - If you wish to speak, please confirm which part of your re			sary to speak at the hearing -

Representor ID and details: 4805/DP1 Mr Matthew Mor	gan
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	e Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do ✓ Comment form you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: 18. 98
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan	n? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Ves Unanswered Notes:
3d - If your representation relates to a new, deleted or amend	led site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below: See supporting information	
3f - Please outline the changes you wish to see made to the l See supporting information	Deposit Plan to make it sound (if relevant)
4h - If you wish to speak please confirm which part of your re	epresentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details:	4805/DP2 Mr Matthew Morga	an						
Date Lodged Status Petition a 02/04/2012 M	and No. Supporting Evidence	Additional SA SEA		Rep format: Comment form	·	t your comments to be ak at a hearing session	•	n representations' or do on? Written
2a - Do you consider the LDP is S		Procedural Tests -	ne Plan is unsound and P1 - Unanswered C1 - Unanswered	P2 - Unans	` ') that it fails.
			iveness Tests - CE1 -	Unanswered	CE2 - Yes	CE3 - Unanswered	CE4 - Yes	
3a - Which part of the Deposit Pla	, ,	Policy Number: 49	<u>Paragraph</u> 	Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any chan	ges made to the Deposit Plan	as a result of your rep	resentation? Yes	(If	"No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to s	see made to the Deposit Plan?	New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragr Unanswered	aph: <u>New Or Amende</u> Yes	d Site: Other (see N Unanswered	
3d - If your representation relates		d site, did you submit t Site Name:	the site as a Candidate	Site? No	(If "Yes", pl	ease give the Candidat Site Refere		rerence if known)
3e - Please set out your represer See supporting information.	ntation below:				-			
3f - Please outline the changes y See supporting information	rou wish to see made to the De	eposit Plan to make it s	sound (if relevant)					
4b - If you wish to speak, please	confirm which part of your rep	resentation you wish to	o speak to the inspector	about and why th	ev consider it be ned	essary to speak at the	hearing -	

(ordered by Representation ID No.)

Representor ID and details:	1807/DP1 Mrs Margaret Saa	l						
Date Lodged Status Petition a 02/04/2012 M 0	nd No. Supporting Evidence	Additional SA SEA		Rep format: Comment form		your comments to be at a hearing session		representations' or do on? Written
2a - Do you consider the LDP is S		2b - If you think that the Procedural Tests -		nd does not not mee P2 - Yes	t one or more test(s) o	f soundness, please ii	ndicate which test(s)	that it fails.
		Consistency Tests -	C1 - Unanswered	C2 - Yes	C3 - Yes	C4 - Yes	8	
		Coherence and Effective	veness Tests - CE	1 - Yes	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswe	ered
3a - Which part of the Deposit Pla	n are you commenting on?	Policy Number:	Paragra	ıph Number:	Proposal Map:	2	Constraints Map	Appendices:
		49	5.11		MG2 (ID 30); R allocations table (pag Supply Background P 2011)	e 145); Housing		
3b - Do you wish to see any chang	ges made to the Deposit Plan	as a result of your repre	esentation? Yes	(II	f "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to so	ee made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Yes	New Paragraph: Unanswered	Amended Paragra Yes	ph: New Or Amende Yes	d Site: Other (see N Unanswered	
3d - If your representation relates	•	d site, did you submit th Site Name: The Garde			(If "Yes", plea	ase give the Candidat Site Refere	e Site Name and ref	,
3e - Please set out vour represen	tation helow:							

3e - Please set out your representation below:

Please see attached representations.

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

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

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

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

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

(ordered by Representation ID No.)

Representor ID and details: 4807/DP1 Mrs Margaret Saal

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

Summary

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

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

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

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

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

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

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' (strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning

(ordered by Representation ID No.)

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permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.

- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

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

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live-work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

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

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

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

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

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

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

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

Highway safety issues

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

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

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

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

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

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable housing on the site defies logic. At a rate of 3 5% this would only give 14 affordable houses - an increase of only 10 affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

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

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development should respect the character of the surrounding area and should be of appropriate scale and design.

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

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

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

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

The extant planning permission for the Garden Emporium site includes:

- a) a condition (condition 9) that a significant proportion of the site (approx. 30% being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all properties shall be located at least 10 metres from this boundary within the development site; and
- b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

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

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

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

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

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

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

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

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

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

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

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

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.
- "7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.
- "10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.
- TEST C5 The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).

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e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR - Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

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

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

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

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

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

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

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

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability,

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lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).

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

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

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

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

(ordered by Representation ID No.)

Representor ID and details: 48	307/DP2 Mrs Margaret Saa								
Date Lodged Status Petition an 02/04/2012 M □ 0	d No. Supporting Evidence	Additional SA SEA			o format: mment form	•	•	be consiered by 'writter ssion of Public examination	•
2a - Do you consider the LDP is So		•	P1 - Yes	P2	2 - Yes	one or more test(s) o		ase indicate which test(s)	that it fails.
		Coherence and Effective		CE1 - Yes	C	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan		<u>Policy Number:</u> MG9. MD12. MG2		aragraph Numb 49. 6.52. 7.41		Proposal Map: MG9)	Constraints Map Feb 2012	Appendices: Appendix 9 - Supporting Documents
3b - Do you wish to see any change	es made to the Deposit Plan	as a result of your repr	esentation?	Yes	(If "	No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to se	e made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Pol Yes	icy: New P Unans	aragraph: swered	Amended Paragra Unanswered	<u>New Or Ame</u> Yes	ended Site: Other (see N Unanswered	
3d - If your representation relates t		d site, did you submit the Site Name: Land East		ndidate Site?	Yes	(If "Yes", ple	Ū	didate Site Name and reference: Site reference	erence if known) MG 9 / ID 22 Appendix 1
0 51	Care hadann								

3e - Please set out your representation below:

The proposed Gypsy traveller site would be situated on a green field area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the councils own report – Fordham report).

I do not support this unfair proposal, the council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

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

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

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

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

From my understanding of the LDP, it struck me that its aims for the traveller site greatly conflict with the desires that are often represented by those in the G&T community (i.e. as discussed in the Fordham report). As an illustrative example from this report, it was found that those living on the Shirenewton site were critical of its location from local amenities and a lack of access to public transport. They also commented that their preference was for their living sites to be situated on the outskirts of towns. In this respect this makes me more concerned that Llangan as a place will ultimately fail in responding to their

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Representor ID and details: 4807/DP2 Mrs Margaret Saal

needs since the village does not have accommodating resources.

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

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

Additional information attached:

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

TEST P1

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

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

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

TEST C1

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

TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.

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Representor ID and details: 4807/DP2 Mrs Margaret Saal

- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4.1 of PPW:
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site:
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site, and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

TESTC3

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

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Representor ID and details: 4807/DP2 Mrs Margaret Saal

TESTC4

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

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

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

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

TEST CE1

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

- The Strategy makes the following statements:

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

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

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

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

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

Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

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

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- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

TEST CE2

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

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

TEST CE3

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

TEST CE4

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

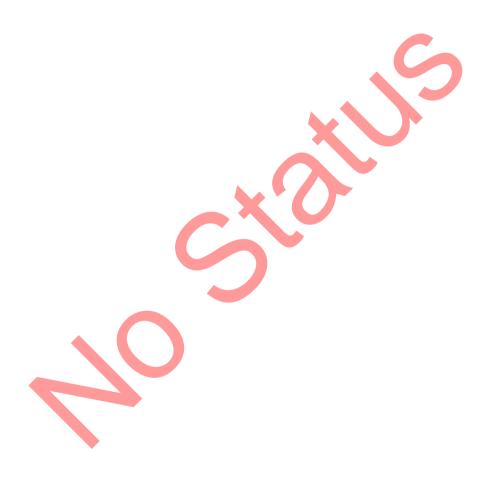
The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

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

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



Representor ID and details: 4809/DP1 Hilda Pitman			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA	Rep format: 4a - do you want your comments to be comment form 4a - do you want your comments to be comment form 4a - do you want your comments to be comment form 4a - do you want your comments to be comment form 4a - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want your comments to be comment form 4b - do you want to speak at a hearing session of the comment form 4b - do you want to speak at a hearing session of the comment form 4b - do you want to speak at a hearing session of the comment form 4b - do you want to speak at a hearing session of the comment for the comment form 4b - do you want to speak at a hearing session of the comment for the co	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered	pes not not meet one or more test(s) of soundness, please inc P2 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unan	
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Yes CE3 - Unanswered	CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map: Co	onstraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	Unanswered Unanswered U	ew Paragraph: Amended Paragraph: New Or Amended Inanswered Yes	Site: Other (see Notes): Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Si Site Name: Land to west of St Athan Road Lla		Site Name and reference if known) ce: 2446/CS1, 2446/CS2
located at the bottom of my garden. This pumping station	frequently breaks down with deafening banging r more the odour from the nearby sewerage wor	ling not only the overpowering smells from the nearby sewera noises and even floods sewerage. As you can imagine this is which site MG2(13) is even closer- can be so strong you of	extremely unpleasant and Dwr Cymru
Traffic-There is no point in widening the St Athan Road for Bridgend and the West along this road turn left into Brook all the way up Brookfield Park Road on both sides, also of There are two Primary Schools and a Nursery who access	field Park Road to miss using the lights at the jun Broadway.	needed to be taken right the way through to St Athan. Furthe nction. There is also a big problem with buses dropping child	rmore, cars and buses travelling to ren off at the Welsh School, parents parking
Traffic congestion and parking is a major issue in Cowbrid not want to come here and shop because they will physical		s will unarguably lead to more cars, which will be very counter	productive for the town because visitors will
I hope these comments will be seriously considered becar	use as a local Cowbridge resident we face these	problems on a daily basis.	
3f - Please outline the changes you wish to see made to the D Have candidate site removed and include as a green wed		S.	
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector a	about and why they consider it be necessary to speak at the h	earing -

Representor ID and details: 4810/DP1 Stewart Kennedy							
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA	•	Rep format: Comment form	, ,		be consiered by 'written i ion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the PI Procedural Tests - P1 Consistency Tests - C1 Coherence and Effectivence	I - Unanswered I - Unanswered	P2 - Unanswe	` '		` '	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(11). MG12(11). MG	Paragraph Nu		Proposal Map:)	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your represe	ntation? Yes	(If "	No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: An Unanswered Ye Notes:	•	w Paragraph: answered	Amended Paragrap Unanswered	h: <u>New Or Amen</u> Yes	nded Site: Other (see No Unanswered	otes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the s Site Name: Cowbridge Ca				0	date Site Name and refe erence: 178/CS1 2440	,
3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market has	been allocated for residenti	ial development. This is	s unsound and o	objected to on the grou	unds that-		
The Cowbridge Cattle Market, which sells on average over	er500 head of sheep per we	ek, is trading successfu	ully and supporti	ing the farming comm	unity of the Vale o	of Glamorgan and should	not be closed.
On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town.							
Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.	the replacement cattle mai	rket. This is a greenfiel	ld site and propo	sals are made within	the LDP for its pu	rchase and development	t as a market. The
3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.	eposit Plan to make it soun	d (if relevant)					
An additional policy should be included upholding the cor on the site to support the attractiveness of Cowbridge as				ural economy of the Va	ale of Glamorgan	and the provision of imp	roved parking facilities
4b - If you wish to speak, please confirm which part of your re	oresentation you wish to spe	eak to the inspector ab	out and why the	y consider it be neces	sary to speak at t	he hearing -	

Representor ID and details: 4811/DP1 Peter Gillibrand								
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		Rep format: Comment form	, ,		consiered by 'written r n of Public examination	•	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered							
	Coherence and Effective			CE2 - Unanswered	CE3 - Unanswered			
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>		Proposal Map: MG2(13)	<u> </u>	Constraints Map	Appendices:	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repres	sentation? Yes	(If	"No" or "Unanswered	" - go to 3d)			
3c - What changes would like to see made to the Deposit Plan?			New Paragraph: Unanswered	Amended Paragram Unanswered	<u>New Or Amende</u> Unanswered	ed Site: Other (see No Unanswered	<u>vtes):</u>	
	Notes:							
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name: Land east a			(If "Yes", plea	•	ite Site Name and reference: 2446/CS1, 2446	,	
3e - Please set out your representation below:		· ·						
 The major part, if not all, of this land, was the subject of -Undesirable and conspicuous intrusion into open country -Adverse effect on important local amenities because of of The reasons for rejection then are just as valid in 2012, m 	into the Thaw Valley. change in character and th	ne route of the public f	footpath.		-	nmittee level and on Ap	peal.	
The land to be included in the LDP cannot be considered all set off nicely with a 'landscaped walk' along the river be						f the adjoining fields co	uld not be developed-	
Apart from the impact on the environment and the pres side of Llanblethian would be totally out of character with				d provisions generally,	the development of r	relatively high density h	ousing on the south	
3f - Please outline the changes you wish to see made to the D I understand this land is currently outside the existing sett should be removed from the LDP as a Candidate Site.		,	Special Landscap	pe Area. This Greenfiel	d site, which is esse	entially farmland and ac	tively used as such,	
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to s	speak to the inspector	about and why th	ney consider it be neces	ssary to speak at the	e hearing -		

Representor ID and details:	4812/DP1 Mr M Thomas							
Date Lodged Status Petition 02/04/2012 M	and No. Supporting Evidence 0 ✓	Additional SA SEA		Rep format: Comment form	*		e consiered by 'writter on of Public examination	n representations' or do on? Written
2a - Do you consider the LDP is	Sound? Unsound	Procedural Tests -	ne Plan is unsound and P1 - Unanswered C1 - Unanswered	P2 - Unans	` '		e indicate which test(s)	that it fails.
			iveness Tests - CE1		CE2 - Unanswered	CE3 - Unanswere		
3a - Which part of the Deposit P	lan are you commenting on?	Policy Number: 49	<u>Paragrapl</u>	n Number:	Proposal Map:)	Constraints Map	Appendices:
3b - Do you wish to see any cha	nges made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to	see made to the Deposit Plan?	? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amend Yes	ded Site: Other (see N Unanswered	
3d - If your representation relate	es to a new, deleted or amende	ed site, did you submit Site Name: Wick Roa		Site? Yes	(If "Yes", plea		ate Site Name and ref	erence if known)
3e - Please set out your represe See supporting information					y			
3f - Please outline the changes See supporting information	•	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please	e confirm which part of your rep	presentation you wish t	o speak to the inspecto	r about and why th	nev consider it be nece	ssarv to speak at th	ne hearing -	

Representor ID and details: 4813/DP1 Georgina Hawkins	•						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	•	your comments to be o	•	representations' or do on? Written
•	2b - If you think that the Procedural Tests -	ne Plan is unsound and o	does not not meet P2 - Unans	` '	f soundness, please ir	ndicate which test(s)	that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unans	wered C3 - Unan	swered C4 - Una	answered	
	Coherence and Effect	iveness Tests - CE1 -	Unanswered	CE2 - Yes	CE3 - Unanswered	CE4 - Unanswe	red
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:	<u>C</u>	Constraints Map	Appendices:
				MG2(13)			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If	"No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered	· ·	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amended Yes	d Site: Other (see N Unanswered	
	Notes:						
3d - If your representation relates to a new, deleted or amended		the site as a Candidate S vest of St Athan Road Lla		` '	ase give the Candidate a Site Referen	e Site Name and refunce: 2446/CS1, 244	,
3e - Please set out your representation below:				-			
The proposed site is totally inappropriate for the intended of interfere with the current nearby public right of way, which With the recent loss of 'Valeways', the voluntary group that nearby have quickly fallen into disrepair. This development University of Nottingham and current environmental managet sold at Cowbridge prices!	is a valuable asset to t was recently closed of t will only serve to furth	the Vale <mark>of Glamorgan a</mark> owing to budget cutbacks her damage the footpath	nd the Cowbridge s and that was re network. If peopl	e and Llanblethian are sponsible for maintain le can't walk here, the	as in particular. Why b ing footpaths of behalf y'll take their money el	ouild over the main s f of the Vale Council sewhere. As a geog	elling point of the Vale? , a number of footpaths raphy graduate from the
3f - Please outline the changes you wish to see made to the De Have candidate site removed and include as a green wedc			ns				
4b - If you wish to speak, please confirm which part of your rep		-		nov consider it he nece	essary to speak at the	hooring	

Representor ID and details: 4814/DP1 Paul J Bertorelli							
Date Lodged 02/04/2012Status MPetition and No. DescriptionSupporting Evidence000	Additional SA SEA		Rep format: Comment form			be consiered by 'written ion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests - If Consistency Tests - Coherence and Effective	P1 - Unanswered C1 - Unanswered	P2 - Unansv	` '		`,	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(11). MG12(11). M	Paragraph	<u></u>	Proposal Map: MG2(11))	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repres	sentation? Yes	(If	"No" or "Unanswered	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan		· · · · · · · · · · · · · · · · · · ·	New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amer Yes	nded Site: Other (see No Unanswered	otes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name: Cowbridge (\ ''	0	date Site Name and refe erence: 178/CS1 2440	,
3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market has	been allocated for reside	ntial development. Thi	is is unsound and	objected to on the gro	unds that-		
The Cowbridge Cattle Market, which sells on average over	er500 head of sheep per w	week, is trading succes	ss <mark>ful</mark> ly and suppor	ting the farming comm	unity of the Vale of	of Glamorgan and should	not be closed.
On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town.							
Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.	the replacement cattle m	narket. This is a green	field site and prop	osals are made within	the LDP for its pu	rchase and developmen	t as a market. The
3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.	eposit Plan to make it sou	und (if relevant)					
An additional policy should be includied upholding the cor on the site to support the attractiveness of Cowbridge as				Itural economy of the \	ale of Glamorgan	and the provision of imp	proved parking facilities
4b - If you wish to speak, please confirm which part of your re	oresentation you wish to s	peak to the inspector	about and why the	ey consider it be neces	sary to speak at t	the hearing -	

Representor ID and details: 4815/DP1 Martin Lewis				
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		our comments to be consiered by 'written represent at a hearing session of Public examination? Writte	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 -	P2 - Unanswered C2 - Unanswered C3 - Unans	soundness, please indicate which test(s) that it fails wered C4 - Unanswered CE3 - Yes CE4 - Unanswered).
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph MG2(11). MG12(11). MG15	Number: Proposal Map:MG2(11)	Constraints Map Append	dices:
3b - Do you wish to see any changes made to the Deposit Plan		(If "No" or "Unanswered	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan		New Paragraph: Amended Paragrap Unanswered Unanswered	h: New Or Amended Site: Other (see Notes): Yes Unanswered	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate S Site Name: Cowbridge Cattle Market - Lan <mark>d v</mark>		se give the Candidate Site Name and reference if k Site Reference: 178/CS1 2440/CS2	nown)
3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market has The Cowbridge Cattle Market, which sells on average over				olosed.
On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town.				
Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.	r the replacement cattle market. This is a green	field site and proposals are made within	he LDP for its purchase and development as a ma	rket. The
3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15. An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as	tinuation of the Cowbridge Cattle Market in supp		ale of Glamorgan and the provision of improved par	king facilities
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspector	about and why they consider it be neces	sary to speak at the hearing -	

(ordered by Representation ID No.)

	•		•		,	•			Representation ID No.)
Representor ID and de	etails: 4816/D	P1 P Wilkins							
Date Lodged Status	Petition and No.	Supporting Evidence	Additional SA SEA		Rep format:	,	,	be consiered by 'writter	•
02/04/2012 M	0				Comment form	you want to spe	eak at a hearing ses	sion of Public examinati	on? Written
2a - Do you consider the	e LDP is Sound?		2b - If you think that Procedural Tests -	the Plan is unsound and P1 - Unanswered	does not not meet of	` '	of soundness, plea	se indicate which test(s) that it fails.
			Consistency Tests -	C1 - Yes	C2 - Unansw	ered C3 - Una	answered C4 -	Yes	
			Coherence and Effe	ctiveness Tests - CE1	- Unanswered C	E2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the D	eposit Plan are y	ou commenting on?	Policy Number:	<u>Paragrap</u>	n Number: F	roposal Map:		Constraints Map	Appendices:
			MG2(11). MG2(15).	7.56		MG2(11)			
3b - Do you wish to see	any changes ma	de to the Deposit Plan	as a result of your re	presentation? Yes	(If "	No" or "Unanswer	ed" - go to 3d)		
3c - What changes wou	ld like to see mad	de to the Deposit Plan?	· · · · · · · · · · · · · · · · · · ·	Amended Policy:	New Paragraph:			ended Site: Other (see I	
			Unanswered	Yes	Unanswered	Unanswered	Yes	Unanswere	d
			Notes:						
3d - If your representat	ion relates to a ne	ew, deleted or amende	, ,	t the site as a Candidate bridge Cattle Market, (b)		` ''	J	didate Site Name and re	,
3e - Please set out you	ır representation l	pelow:							
The Cowbridge Cacapacity (ref 2).	attle Market perfo	rms an essential functi	on in the town, for fa	rmers as their preferred s	site for trading livesto	ock (ref 1) and for	visitors and shoppe	rs as an informal car par	k with 200 space
				es and 30% of the 651 to nit spaces planned for lat		privately owned lo	ng stay spaces in a	nd around the town cent	re. (There are also 122

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

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

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

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

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

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

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

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

LDP Section 4 Vision and Objectives paragraph 4.3 states:

(ordered by Representation ID No.)

Representor ID and details: 4816/DP1 P Wilkins

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

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

- (ref 1) Report to the Vale of Glamorgan Council "Retention of Cowbridge Livestock Market" (Oct 2011 by D.R.S. Harris)
- (ref 2) Consultation information on Parking in Cowbridge (2005, rev 2012) by C.A Pearce and D.R. Williams, Cowbridge and Llanblethian Residents Group.
- (ref 3) Cowbridge Town Hall Car Park User Survey (Oct 2005) by C.A. Pearce and D.R. Williams
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) Delete Policy MG2 (11)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing Cowbridge Town is in desparate need for parking facilities for both workers and visitors.

Representor ID and details: 4817/DP1 Vivienne Bellamy			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		comments to be consiered by 'written representations' or do hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	pes not not meet one or more test(s) of sou P2 - Unanswered	ndness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswer	ed C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Inanswered CE2 - Unanswered CI	E3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
	MG2(19). MG2(20)		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswer-	red (If "No" or "Unanswered" - g	o to 3d)
3c - What changes would like to see made to the Deposit Plan?			New Or Amended Site: Other (see Notes): Unanswered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Sit Site Name:	te? Unanswered (If "Yes", please of	give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below:			
Vale of Glamorgan Deposit Local Development Plan 2011	- 2026		
I refer to the above plan and my comments are as follows			
	s annexe and Caerleon Road. Both sites are on t	the Murch side of the community which is	local highway network. In Dinas Powys it is proposed that a served by only two access points to the main road (A4055). spacity or structurally suspect.
The 400 houses would generate between 600 and 800 ad existing roads are under great pressure now.	ditional cars in both directions, particularly at pea	ak times. The additional traffic would have	a profound and adverse impact on the community as the
There also appears to be no serious consideration having	been given to other views as to the future possil	ble use of the St Cyres Annexe.	
Much of the extra traffic from a housing development wou excessive.	d be funnelled through Dinas Powys and join the	e ever lengthening queues leading to and f	rom the Merrie Harrier. Already the air pollution levels are
It is essential that major highway infrastructure improvement	ents are 'shared' and made, before hundreds of a	additional housing could even be considered	d.
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector a	bout and why they consider it be necessar	y to speak at the hearing -

Valo of Clamorgan Council I coal Dayslanmont Dian DEDOSIT DLAN (February 2012) DEDDESENTATION DETAILS: (ordered by

epresentor I	D and d	letails:	4818/DF	P1 Ken Shapley							
ate Lodged 02/04/2012	Status M	Petitio	n and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Letter		your comments to be cons at a hearing session of P		
a - Do you co	nsider tl	he LDP i	s Sound?	Unanswered	2b - If you think that th Procedural Tests -	ne Plan is unsound and P1 - Unanswered	d does not not meet P2 - Unansv	, ,	f soundness, please indica	te which test(s) that it fails.
					Consistency Tests -	C1 - Unanswered	C2 - Unansv	vered C3 - Unan	swered C4 - Unansw	ered	
					Coherence and Effect	iveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	ered
a - Which par	rt of the	Deposit I	Plan are yo	ou commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:	Cons	raints Map	Appendices:
					MG2(16)						
	ŭ			•	New Policy: Unanswered Notes: d site, did you submit t	Amended Policy: Unanswered the site as a Candidate	New Paragraph: Unanswered e Site? Unanswere	Unanswered	ph: New Or Amended Site Unanswered ase give the Candidate Site Site Reference:	Unanswere	d
Be - Please se	ot out v.o						\ \				
	,				as to the negative cor	nsequences of the prop	oosed additional hou	ısing.			
									ed. The existing traffic, mu be a gross dereliction of du		
The impli	ications	in terms	of:								
						pobitic sufferers and th	e notential for more	road traffic accidents	with, in both instances, re-	sultant higher o	nets to the NHS
(i) increa	sed exh	aust emi	ssion level	s on the growing numi	per of astrima and bror	icilius suiterers and in	e potential for more	Todu tranic accidents	with, in both matanecs, re-	sultant migner t	oolo lo liic ivi io,

It should, furthermore, be borne in mind, that part of the attraction of Cosmeston Country Park is to enable people to escape from suburbia, since in reality Penarth, Dinas and Barry are mere suburbs of Cardiff, and so to extend and juxtapose urban development in close proximity to said park and its adjacent rural setting, would be to seriously diminish its amenity, attractiveness and its beneficial effects on the visiting populace, including many ethnic groups from Cardiff's inner city who are regular users.

Given the Welsh Government (in its former guise as LAW/WDA) acquired much of the subject land, it is not difficult to imagine how they must be 'rubbing their hands' at the prospect of the windfall profits land sales, with the benefit of residential planning permission, would bring them. Though their siren call will be 'homes for the people' let them build, if so many homes really are needed, on former industrial land, of which South East Wales has enough for Britain!

Perhaps, the Inspector should allow for the possibility of the construction of the Severn Barrage between Lavernock and Weston Super Mare should the wind turbine experiment prove to be the very expensive flop many experts predict. This would mean not taking decisions now that could inhibit or obstruct access in the future to the barrage site at Layernock.

The Vale Council appears to exist almost exclusively for the benefit of Barry and the Barry ratepayers with, furthermore, the vast majority of its workforce also recruited from the town. That should be enough in itself, without the Council doing further harm to the town and people of Penarth and the adjacent settlements of Lavernock, Sully and Dinas Powys by also adopting the above additional housing provision plan.

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

Representor ID and details: 4819/DP1 D England				
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	e Additional SA SEA		our comments to be consiered by 'written representatio at a hearing session of Public examination? Written	ns' or do
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and or Procedural Tests - P1 - Unanswered	loes not not meet one or more test(s) of P2 - Unanswered	soundness, please indicate which test(s) that it fails.	
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unans	wered C4 - Unanswered	
	Coherence and Effectiveness Tests - CE1 -	Unanswered CE2 - Yes	CE3 - Yes CE4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph MG2(11). MG12(11). MG15	Number: Proposal Map:MG2(11)	Constraints Map Appendice	<u>s:</u>
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your representation? Yes	(If "No" or "Unanswered	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan		New Paragraph: Jnanswered Unanswered	h: New Or Amended Site: Other (see Notes): Yes Unanswered	
3d - If your representation relates to a new, deleted or amend	led site, did you submit the site as a Candidate S Site Name: Cowbridge Cattle Market - Land w		se give the Candidate Site Name and reference if know Site Reference: 178/CS1 2440/CS2	n)
3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market ha The Cowbridge Cattle Market, which sells on average ov				ed.
On non market days the site is used for car and coach p made within the LDP for the lost car and coach parking market town.	arking for up to 200 cars. Apart from an allocation spaces. The loss of car parking spaces would ha	n of a small site adjacent to the town wave an adverse effect on the trading com	Il which would hold approximately 25 cars, no provision nunity in Cowbridge and the attractiveness of Cowbridge	has been je as a
Policies MG12 (11) and MG15 refer to a proposed site for policy is objected to as being unsound.	or the replacement cattle market. This is a green	rield site and proposals are made within	the LDP for its purchase and development as a market	. The
3f - Please outline the changes you wish to see made to the Delete Policies MG2 (11), MG12(11) and MG15.	Deposit Plan to make it sound (if relevant)			
An additional policy should be includied upholding the coon the site to support the attractiveness of Cowbridge as			ale of Glamorgan and the provision of improved parkin	g facilities
4b - If you wish to speak, please confirm which part of your re	epresentation you wish to speak to the inspector	about and why they consider it be neces	sary to speak at the hearing -	.========

Representor ID and details: 4820/DP1 Mrs S A Flower	
Date LodgedStatusPetition and No.Supporting EvidenceAdditional SA SEARep format:4a - do you want your comments to be consiered by 'writ you want to speak at a hearing session of Public examin	•
2a - Do you consider the LDP is Sound? Unsound 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test Procedural Tests - P1 - Unanswered P2 - Unanswered	(s) that it fails.
Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered	
Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered CE4 - Unanswered CE4 - Unanswered CE4 - Unanswered CE5 - Yes	wered
3a - Which part of the Deposit Plan are you commenting on? Policy Number: Paragraph Number: Proposal Map: Constraints Map	Appendices:
MG2(13)	
3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Unanswered Unanswere	
Notes:	
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and Site Name: Land to west of St Athan Road Llamblethian, Land to east of St Athan Roa Site Reference: 2446/CS1, 2	,
3e - Please set out your representation below:	
 Greenfield site outside the boundary of Cowbridge and 100 houses will be unsuitable in this landscape. Parking in Cowbridge is my biggest worry. My husband is disabled and it is already impossible very often to find a parking space. These houses will make this even worse. This site is a part of a special landscape area and should not be developed. There is not enough capacity for sewerage. There will also be more pressure on other local services. Traffic through the town already means delays and congestion. We cannot allow this to get any worse. The road is too narrow and quite unsuitable for access. 	
3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) Have candidate site removed and include as a green wedge to prevent further development considerations.	
4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -	

Representor ID and details: 4821/DP1 Steven Madeley							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Comment form	· · · · · · · · · · · · · · · · · · ·		be consiered by 'written ion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and o P1 - Yes	does not not meet P2 - Yes	one or more test(s) of	soundness, pleas	se indicate which test(s)	that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 -	Yes	
	Coherence and Effec	tiveness Tests - CE1 -	Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
	MD12. MG9					Constraints map feb 2012	Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Amer	nded Site: Other (see No	otes):
	Unanswered	Yes	Unanswered	Unanswered	Yes	Unanswered	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name: Land Ea		Site? Yes	(If "Yes", plea	•	date Site Name and refe erence: MG 9 / ID 22	erence if known)
3e - Please set out your representation below: P1. Not prepared in accordance to community involvement	nt scheme. No consult	ation to emergency service	ces and school. C	consultees not informed	d. Onus to consult	to strategic partners	
P2. Sustainability proposal flawed and contradictory – site consistent with LDP policies.	e does not meet nation	al policy in this regard. A	llocation not cons	istent with planning rej	ections of Bonvils	ton and Pembroke. MG	9 alloction not
C1. Land use plan does not relate to strategy							
C2. Does not have regard to National Policy							
C4. Too far from public transport / no facilities							
CE3. No reference to how the site will be managed							
3f - Please outline the changes you wish to see made to the D Remove MG 9 from the plan	eposit Plan to make it	sound (if relevant)					
MD 12 amended so as not to discriminate against the trav	velling community						
The site is too large, in an unsuitable location for its poter	itial occupants.						
4b - If you wish to speak, please confirm which part of your rep	presentation you wish	to speak to the inspector	about and why the	ey consider it be neces	ssary to speak at t	he hearing -	

Representor ID and details: 4822/DP1 Mr & Mrs John S	nerratt		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA	Rep format: Comment form	4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	does not not meet one P2 - Unanswere	e or more test(s) of soundness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswer	ed C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - L	Unanswered CE	2 - Yes CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Pro	posal Map: Constraints Map Appendices:
			MG2(13)
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your representation? Yes	(If "No	" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan			Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Yes Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Si Site Name: Land to west of St Athan Road Lla		(If "Yes", please give the Candidate Site Name and reference if known) ast of St Athan Roa Site Reference: 2446/CS1, 2446/CS2
3e - Please set out your representation below:			
We object to further development in the fields at the end 1) The impact on the landscape 2) Issues surrounding access both in relation to St Athan 3) The impact on Cowbridge/Llanblethian- in our view we 4) The nature of the public right of way, which is enjoyed 5) We appreciate that Cowbridge has to change to meet adverse effect.	Road but in particular Windmill Lane. do not need anymore houses, nor do we need a by many people, not only inhabitants of Cowbrid	dge and Llanblethian	
3f - Please outline the changes you wish to see made to the D Have candidate site removed and include as a green wed		ns.	
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspector ε	about and why they	consider it be necessary to speak at the hearing -

Representor ID and details: 4823/DP1 C R Griffiths			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		ents to be consiered by 'written representations' or do ng session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and or Procedural Tests - P1 - Unanswered	does not not meet one or more test(s) of soundnes P2 - Unanswered	ss, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 -	Unanswered CE2 - Yes CE3 - Ye	es CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph	Number: Proposal Map:	Constraints Map Appendices:
	MG2(11). MG12(11). MG15	MG2(11)	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3	d)
3c - What changes would like to see made to the Deposit Plan		New Paragraph: Amended Paragraph: New 0 Unanswered Unanswered Yes	Or Amended Site: Other (see Notes): Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	nd site, did you submit the site as a Candidate S Site Name: Cowbridge Cattle Market ¬- Land	` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	e Candidate Site Name and reference if known) Site Reference: 178/CS1 2440/CS2
3e - Please set out your representation below: The Cowbridge Cattle Market, which sells on average over	rv 500 head of sheep per week, is trading succ	essfully and supporting the farming community of	the Vale of Glamorgan and should not be closed.
On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking sparket town.			
Policies MG12 (11) and MG15 refer to a proposed site for policy is objected to as being unsound.	the replacement cattle market. This is a green	field site and proposals are made within the LDP f	or its purchase and development as a market. The
3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.	eposit Plan to make it sound (if relevant)		
An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as			morgan and the provision of improved parking facilities
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspector	about and why they consider it be necessary to sp	peak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4824/DP1 Dr David J Stazik	er FCA, CF						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	· · · · · · · · · · · · · · · · · · ·	r comments to be cons a hearing session of P	,	
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	P1 - Unanswered	P2 - Unans	t one or more test(s) of so wered wered C3 - Unanswe	.,		fails.
	Coherence and Effecti	veness Tests - CE1 -	Unanswered	CE2 - Unanswered C	E3 - Unanswered	CE4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2	<u>Paragraph</u> 7.10. 8.13.		Proposal Map: MG2(33)- Land to to Nicholas		traints Map Ap	pendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	resentation? Yes	(If	f "No" or "Unanswered" - g	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragraph: Unanswered	New Or Amended Site Yes	e: Other (see Notes): Unanswered	
3d - If your representation relates to a new, deleted or amende				(If "Yes", please 25/CS.1 (2 of the 3 field	give the Candidate Sit Site Reference:	e Name and reference Land to the East of S	,
20 Places set out your representation below:							

3e - Please set out your representation below:

My proposed changed is the deletion of the land to the East of St. Nicholas (site MG 2 (33)) from the Deposit LDP for the Vale of Glamorgan.

My reasons for the deletion are as follows:

- 1. Road Safety. All of the other proposed sites in St. Nicholas to be included in the LDP were rejected. A recurring reason for this was that the sites were subject to significant highway constraint. I cannot see why site MG 2 (33) does not have the same issue. The proposed entry to the site is at the east end of the village, where cars travelling to Cardiff have usually accelerated past the 30mph limit. Residents in the village benefit from the traffic lights in the middle of the village at peak times to get onto the A48. The new site does not propose new traffic lights or a roundabout and so access to and from the A48 at peak times will be hazardous, especially given the number of additional new cars.
- 2. Pedestrian Safety. The proposal is to build 50 houses on the site. There are 1 52 existing properties in St. Nicholas, thus the proposal will increase the size of the village by one third, a substantial increase. The part of the village north of the A48 where the houses will be built does not have any pavements and the increase in cars and pedestrians will automatically increase the safety risks of pedestrians in the village.
- 3. Climate Change. Assuming two cars per new house, the site will increase the number of cars in the village by around 100, or a third. There are no shops in the village, therefore all residents have to travel to buy supplies etc. Arguably the proposed site will therefore increase the effects of climate change in the village which is contrary to Objective 2 of the LDP.
- 4. Congestion. The A48 is a busy road and congestion already builds back from the bottleneck at Culverhouse Cross to St. Nicholas and beyond at peak times. The proposed site will only add to this congestion as will all the other proposed sites east of Cowbridge which filter onto the A48. I argue that this is contrary to Objective 6 of the LDP, which is to reinforce the vitality, viability and attractiveness of the Vale of Glamorgan's district, local and neighbourhood shopping centres. The additional congestion of these sites in the Vale without improving the road infrastructure will cause significant congestion at peak times at Culverhouse Cross and reduce the attractiveness of this shopping centre.
- 5. Facilities. I believe a development of this size (50 houses) compared to the existing village (152 houses) without the building of any additional facilities will simply overwhelm the village. St. Nicholas currently has a school, a church, a chapel, a phone box, a post box and a bus stop. There is no shop, post office, doctor's surgery, nursery, public house, restaurant or other social gathering sites. The facilities are already strained. The proposal to expand the village by one third will make the strain on the limited facilities much worse. The proposal includes social housing where the lack of normal facilities (shops etc) and expensive/limited public transport costs will be particularly felt. This is contrary to Objective 1 of the LDP, namely to sustain and further the development of sustainable communities within the Vale, providing opportunities for living, learning, working and socialising for all. I do not see how Objective 1 is met by the proposal given the

and further the development of sustainable communities within the Vale, providing opportunities for living, learning, working and socialising for all. I do not see how Objective 1 is met by the proposal given the very limited facilities in the village and the large development proposed. This is also contrary to Objective 3 of the LDP which seeks to reduce the need for Vale of Glamorgan residents to travel to meet their

(ordered by Representation ID No.)

Representor ID and details: 4824/DP1 Dr David J Staziker FCA, CF

daily needs - without facilities in the village, this is not possible. Similarly, the proposal fails to achieve Objective 5 of the LDP, to maintain, enhance and promote community facilities and services in the Vale of Glamorgan - there is clearly no maintenance or enhancement of facilities in this proposal.

- 6. Demand. In the Vale of Glamorgan Council's report "Local Housing Market Assessment" dated November 2010, it notes that there is no net demand for affordable houses in St. Nicholas and the East of the Vale. There are many more suitable sites (indeed existing empty housing stocks in urban areas such as Barry) which could accommodate the size of the proposal in St. Nicholas and provide the necessary facilities for the social housing residents.
- 7. Green field site. St. Nicholas is a conservation area and the proposed construction is right on the perimeter of the conservation area. The development will change the character of the village, it will change the architectural appeal and the views of the village. Given the fact that St. Nicholas is a conservation area, it is not logical to me that new builds can be put on greenfield sites next to the conservation area. I believe this is contrary to Objective 4 of the LDP namely to protect and enhance the Vale of Glamorgan's historic, built and natural environment. Surely new sites should be put on brown field sites first before green field sites? The fact that St. Nicholas is a conservation area should prevent this type of building scheme. Indeed, I believe the proposed development conflicts with Council policy (MG 7) for residential development within Minor Rural Settlements.
- 8. Site selection score. I cannot understand how the site was selected from the scores indicated on page 52 of the Background paper entitled Findings of the Candidate Site Assessment Process dated November 2011. I note the proposed site MG 2 (33) scored one "++", two "+", eight "0", three "-" and one "--". At best the selection must be marginal as compared to the scores for other selected sites. Given the concerns listed above, I feel the site is not marginal, it is simply not appropriate and should be deleted.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) Delete site MG2(33) from the Deposit LDP.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing
 I am willing to speak about all of my representation in order to make sure the Inspector understands all the issues I am making and the reasons for my request to delete site MG2(33) from the deposit LDP.

Representor ID and details: 4825/DP1 Mr & Mrs S M Ho	ckley		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		ur comments to be consiered by 'written representations' or do at a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	The state of the s	does not not meet one or more test(s) of s P2 - Unanswered	soundness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unansw	vered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 -	- Unanswered CE2 - Unanswered	CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph MG2(19). MG2(20). .	Number: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unansw	vered (If "No" or "Unanswered"	- go to 3d)
3c - What changes would like to see made to the Deposit Plan?		New Paragraph: Amended Paragraph Unanswered Unanswered	n: New Or Amended Site: Other (see Notes): Unanswered Unanswered
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site Name:	Site? Unanswered (If "Yes", pleas	e give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: To the Planning Inspector. Referring to the proposed developments in Dinas Powys Some questions that need to be answered positively befo 1. Can Conway Close/Castle Drive/Murch Road cope with 2. Can Cardiff Road cope with the increased traffic from E 3. Is there sufficient public transport to cope with extra pa 4. Can the schools cope with an increase in pupils? 5. How much more pollution will be caused by stationary to the company of the infrastructure first? 7. Can health centre cope with the increase of patients? As we are sure you realise, we are not at all sure that the	re further development is carried out in Dinas I the increase in traffic either over the railway b binas Powys, Barry? ssengers? raffic especially at Dinas Powys Infants schoole.g. Dinas Powys By-Pass? especially as they are crying out for bigger presented.	Powys (Murch area):- pridge to the lights or along Longmeadow [I, at busy times when children are outside emises?	
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
4b - If you wish to speak, please confirm which part of your rep		r about and why they consider it be necess	ary to speak at the hearing -

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

Representor ID and details: 4826/DP1 T P Hellis			
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		comments to be consiered by 'written representations' or do a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of sou P2 - Unanswered	indness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswer	ed C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Unanswered CI	E3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N MG2(19). MG2(20). .	Number: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswe	ered (If "No" or "Unanswered" - g	o to 3d)
3c - What changes would like to see made to the Deposit Plan			New Or Amended Site: Other (see Notes): Unanswered Unanswered
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Si Site Name:	ite? Unanswered (If "Yes", please of	give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below:			
Re Vale of Glamorgan Local Development Plan 2011 - 20	126		
I wish to express my major concerns about plans for 400	additional houses in Dinas Powys.		
As a resident of Dinas Powys for nearly 40 years, I feel th transport systems are just not up to the resulting increase result from these plans would cause gridlock.			larger expansion plans for Barry, the roads and local erloaded already. The significant increase in traffic that would
A further concern I have is about the ability of the seweral which consists of sewage, as the sewage drain also takes		ase in load.We already experience flooding	at the junction of Millbrook road and Pen-y-Turnpike, much of
I hope you will take these views into account when consider	ering future new developments in this area.		
3f - Please outline the changes you wish to see made to the D			
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector a	about and why they consider it be necessar	y to speak at the hearing -

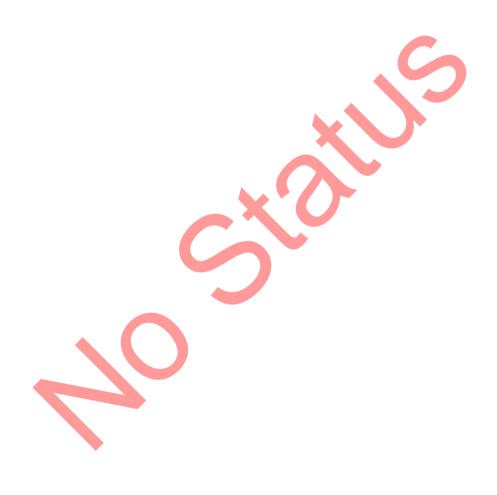
Representor ID and details: 4827/DP1 David Buckland							-
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment forn	4a - do you want y n you want to speak	our comments to at a hearing sess	be consiered by 'written sion of Public examination	representations' or do n? Unanswered
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Yes	d does not not mee P2 - Yes	et one or more test(s) of	soundness, pleas	se indicate which test(s)	that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Unans	swered C4 -	Yes	
	Coherence and Effec	tiveness Tests - CE1	l - Unanswered	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u> p	oh Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?		Amended Policy:	New Paragraph:			nded Site: Other (see N	
	Yes	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	e Site? Unanswe	red (If "Yes", plea	· ·	lidate Site Name and refe ference:	erence if known)
I strongly object to the proposal of the development site M development is essential on this beautiful coastline location. Development can only go ahead on this site at the density detrimental to the wooded backdrop of Cardiff Bay and to the unit of the wooded backdrop of Cardiff Bay and to the their sports activities and to take this away would not be in the density and the density and their sports activities and to take this away would not be in the density and	on. y proposed in the LDP the view of the Bay fro local community. This in their interests. constantly eroding. We ent go ahead we can e Should development go it is also a haven for we	by uprooting numerous om local residents espect as are consequents are consequents are consequents are to another 80 to ahead this one will be wildlife. I have had a life	s protected trees an ecially from Upperconculd development tantly reminded of the cars to use our an elost forever. This	and destroying their associated class. There are for this fact. Building on the lready congested roads a should be considered a should be considered the lithology. From where I	e size intended common as we are constantially	chis will have an adverse cenarth where young peoperan only advance further centre for the remarks are the centre of the centre	effect on the landscape ole can enjoy playing erosion. spaces everywhere are
3f - Please outline the changes you wish to see made to the D Please abandon the proposed plans.	eposit Plan to make it	sound (if relevant)					

Representation ID No.)

Representor ID and details: 4827/DP1 David Buckland

Please protect one of the last remaining open spaces on the cliff tops of Penarth.

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



(ordered by Representation ID No.)

Representor ID and details: 4828/DP1 Janet Sullivan						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter		your comments to be consider at a hearing session of Pul	ered by 'written representations' or do blic examination?
	-		I does not not meet P2 - Unansw		f soundness, please indicate	e which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	vered C3 - Unans	swered C4 - Unanswe	red
	Coherence and Effecti	iveness Tests - CE1	- Unanswered (CE2 - Unanswered	CE3 - Unanswered C	E4 - Unanswered
, , ,	Policy Number: MG2(19). MG2(20)			Proposal Map:	Constra	aints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Unansv	wered (If '	"No" or "Unanswered	l" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amended Site: Unanswered	Other (see Notes): Unanswered
3d - If your representation relates to a new, deleted or amende		the site as a Candidate	Site? Unanswere	ed (If "Yes" ple	ase give the Candidate Site	Name and reference if known)
•	Site Name:	one as a carrandate	Olio. Olidiowolo	(100 , piot	Site Reference:	
0 Di						

3e - Please set out your representation below:

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

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

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

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

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

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

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

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

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

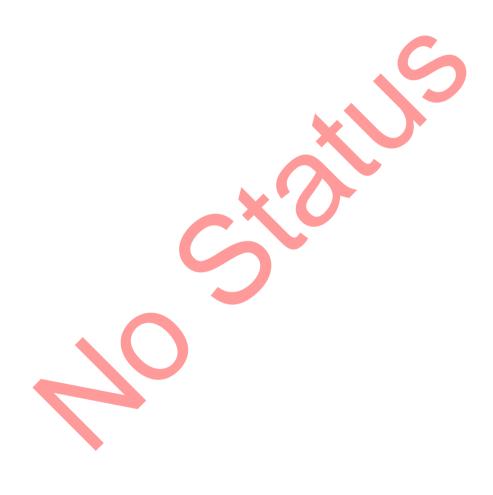
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4828/DP1 Janet Sullivan

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

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



(ordered by Representation ID No.)

Representor ID and details: 4829/DP1 Mrs C M Real							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter		our comments to be at a hearing session		representations' or do on?
2a - Do you consider the LDP is Sound? Unanswered	Procedural Tests -	he Plan is unsound and P1 - Unanswered C1 - Unanswered	P2 - Unans	wered			that it fails.
	Coherence and Effect	tiveness Tests - CE1 -	Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	ered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20).	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Unansw	rered (If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amende Unanswered	d Site: Other (see N Unanswered	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site? Unanswer	ed (If "Yes", plea	ase give the Candidat Site Refere		erence if known)
3e - Please set out your representation below:				*			

The Local Development Plan 2011-2026

Please take into account the following concerns I have regarding the above development.

Local Highways Network

The roads servicing Dinas Powys are already up to capacity, which is evident at peak times of the day. Also there is queuing down to the Merrie Harrier even on Sunday! The road surfaces at the present time are not coping with the heavy traffic so how can highways keep roads fit for purpose with the additional homes being proposed which could mean two cars per household! 800 extra cars just from Dinas Powys!!!! This does not include the Barry development.

If additional housing goes ahead why not build the BYE PASS that was mentioned as far back as 1968.

Dinas Powys Surgery

There is already insufficient parking spaces available for the doctors' surgery, so how will it cope with additional patients after the building of approx. 400 homes. Consideration should be given to building a new surgery by the

Junior School which was mentioned a few years ago.

Environmental Issues

- (1) Pollution is already a serious issue, especially on Cardiff Road, an increase in vehicles, particularly standing traffic, would exacerbate the situation. The infant's school will again be targeted.
- (2) Murch Road was historically marshland. The water table needs to be considered as this will be altered with the extra drainage required. Adding an enormous amount of concrete bases, patios, driveways for the houses expected to be built will cause changes to the ground structure.

Schools

St Cyres Annexe, Murch Road / Junior School

What is going to happen to this building, a shame to pull it all down, can it be used for community needs.

Do the present schools (infants/junior) have the capacity to potentially cope with a huge influx of children?

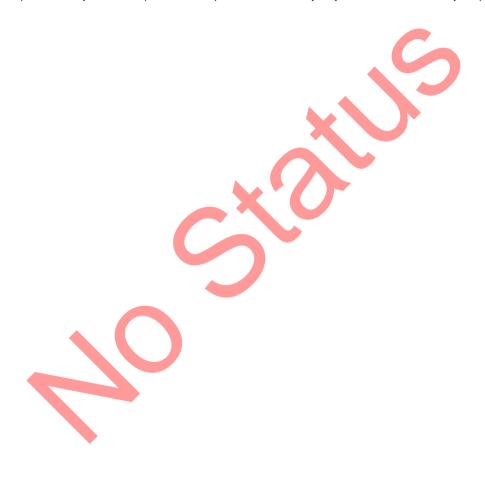
Consideration should be given to opening the road at the side of the St. Cyres school site as a 'one way' traffic system

(ordered by Representation ID No.)

Representor ID and details: 4829/DP1 Mrs C M Real

I live in Murch Road where traffic from the St. Cyres development will travel along, so it is essential that major infrastructure improvements are made before hundreds of additional housing could even be considered.

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



Representor	ID and	details	: 4830/D	P1 Jennifer Ryan							
Date Lodged 02/04/2012		Peti:	tion and No 0	Supporting Evidence	Additional SA SEA		Rep format: Comment form	*		be consiered by 'writte ssion of Public examinati	
2a - Do you c	onsider t	the LDF	P is Sound?	Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound and P1 - Yes	I does not not mee P2 - Yes	et one or more test(s) of soundness, plea	ase indicate which test(s) that it fails.
					Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Un	answered C4 -	Yes	
					Coherence and Effect	tiveness Tests - CE1	- Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which pa	art of the	Depos	it Plan are y	ou commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:		Constraints Map	Appendices:
					MG2(17)	4.3					
3b - Do you w	vish to se	ee any	changes ma	ade to the Deposit Pla	n as a result of your rep	oresentation? Yes	(11	f "No" or "Unanswe	red" - go to 3d)		
3c - What cha	anges wo	ould like	e to see ma	de to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Parag	graph: New Or Ame	ended Site: Other (see	Notes):
					Unanswered	Yes	Unanswered	Unanswered	Unanswered	Unanswere	d
					Notes:						
3d - If your re	epresent	ation re	elates to a n	ew, deleted or amend		the site as a Candidate acent to St. Joseph's S		(If "Yes", p	J	didate Site Name and re eference:	ference if known)
3e - Please s Para. 5.	•	our rep	resentation	below:				y			
be erod	ed. As p	ropose	ed site is on	boundary with local be		ction, area of special so				cation, also boundaries be. The natural environm	petween settlements will ent and wildlife will
Develop	ment an	d build	ing of new h	nouses on the scale pr	oposed is unsustainabl	e and is to the detrimer	nt of local commun	nities, tourism and w	ildlife.		
		•		h to see made to the D order to sustain LDP	Deposit Plan to make it policy.	sound (if relevant)					
4h - If you wi	ish to sn	eak nie	assa confirm	n which part of your re	presentation you wish t	o speak to the inspecto	or about and why th	nev consider it he ne	acessary to speak a	t the hearing -	

(ordered by Representation ID No.)

Representor ID and details:	4832/DP1 Mr & Mrs D Sulliva	an						
Date Lodged Status Petition 02/04/2012 M	n and No. Supporting Evidence 0	Additional SA SEA		Rep format: Letter	, ,	our comments to be con at a hearing session of	•	•
2a - Do you consider the LDP is		2b - If you think that th Procedural Tests - Consistency Tests -	P1 - Unanswered	P2 - Unansv	one or more test(s) of s vered vered C3 - Unansw			nat it fails.
		Coherence and Effecti	veness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswere	d
3a - Which part of the Deposit P	,	Policy Number: MG2(19). MG2(20)	· · · · · · · · · · · · · · · · · · ·		Proposal Map:	<u>Cor</u>	nstraints Map	Appendices:
3b - Do you wish to see any cha	anges made to the Deposit Plan	as a result of your repr	resentation? Unansv	vered (If	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like to	see made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragraph Unanswered	n: New Or Amended S Unanswered	Other (see Not Unanswered	<u>:es):</u>
3d - If your representation relat	•	d site, did you submit tl Site Name:	he site as a Candidate	Site? Unanswere	ed (If "Yes", pleas	e give the Candidate S Site Reference		ence if known)
2a Diagon ant aut vous sonson	antation balavu							

3e - Please set out your representation below:

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

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

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

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

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

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

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

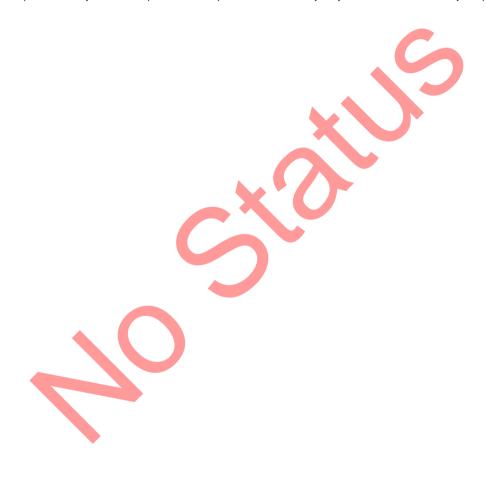
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4832/DP1 Mr & Mrs D Sullivan

I also experienced many many times being jamed in traffic from Cross Common Rd to the Merrie Harrier amd further and that's in the summer, what about winter months.

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



(ordered by Representation ID No.)

Representor ID and details: 4833/DP1 Dr and Mrs M.B J	ames						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter	,	ur comments to be consi t a hearing session of Pu	ered by 'written representatio ublic examination?	ns' or do
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Procedural Tests -		d does not not meet P2 - Unansv	` '	oundness, please indica	te which test(s) that it fails.	
	Consistency Tests -	C1 - Unanswered	C2 - Unansv	wered C3 - Unansw	ered C4 - Unansw	ered	
	Coherence and Effective	veness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered (CE4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)			Proposal Map:	<u>Const</u>	raints Map Appendice	<u>S:</u>
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Unansv	wered (If	"No" or "Unanswered" -	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragraph Unanswered	New Or Amended Site Unanswered	<u>Other (see Notes):</u> Unanswered	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	ne site as a Candidate	Site? Unanswer	ed (If "Yes", please	e give the Candidate Site Site Reference:	e Name and reference if know	n)
O- Disease at a street and a street at the balance							

3e - Please set out your representation below:

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

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

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

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

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

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

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

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

Representation ID No.)

Representor ID and details: 4833/DP1 Dr and Mrs M.B James

My wife and I agree entirely with the contents of the enclosed letter (above).

It is inconceivable that such an enormous housing development should be proposed with no details of improving the highway infrastructure. That should be the first consideration.

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

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



(ordered by Representation ID No.)

Representor ID and details: 4834/I	OP1 Joan Crabtree							
Date LodgedStatusPetition and No02/04/2012M0	Supporting Evidence	Additional SA SEA		Rep format: Letter	, ,	our comments to be considuated at a hearing session of Pu	•	•
2a - Do you consider the LDP is Sound?		•	e Plan is unsound and P1 - Unanswered	does not not meet o	` '	soundness, please indicat	e which test(s)	that it fails.
	С	onsistency Tests -	C1 - Unanswered	C2 - Unansw	ered C3 - Unans	wered C4 - Unanswe	ered	
	С	oherence and Effecti	veness Tests - CE1	- Unanswered C	CE2 - Unanswered	CE3 - Unanswered C	CE4 - Unanswer	ed
3a - Which part of the Deposit Plan are	_	rolicy Number: 1G2(19). MG2(20)	<u>Paragraph</u>		Proposal Map:	Constr	aints Map	Appendices:
3b - Do you wish to see any changes ma	ade to the Deposit Plan as	s a result of your repr	resentation? Unansw	vered (If "	No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see ma	•	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended Site Unanswered	Other (see No Unanswered	<u>otes):</u>
		Notes:						
3d - If your representation relates to a r	·	site, did you submit tl ite Name:	he site as a Candidate	Site? Unanswere	d (If "Yes", plea	se give the Candidate Site Site Reference:	Name and refe	rence if known)

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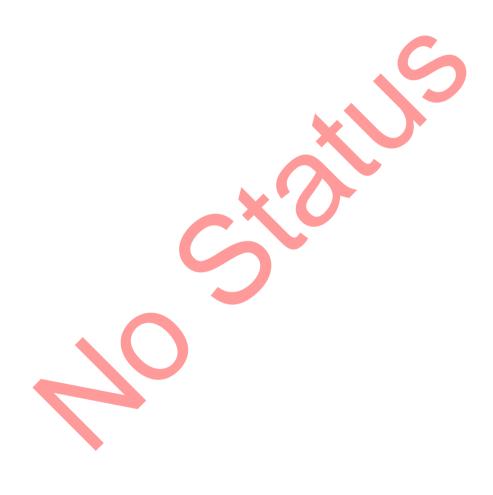
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(ordered by Representation ID No.)

Representor ID and details: 4834/DP1 Joan Crabtree

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

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



Representor ID and details: 4835/DP1 Robert Thomas In	vestments Ltd
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Yes CE2 - Yes CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: SP7. MG20
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Site Reference:
justification to the UDP policy states that the inclusion of to lorries use the B4270 which runs through the village of Lly Llandow. The Deposit LDP contains the UDP allocations for employ Llandow are important rural concentrations of employment employment at the Aerospace Business Park, St. Athan, in the Considering the likely routes that will be used to access substandard road width through the village. The physical laccident trend will not only continue but also increase as a lit is inconceivable to imagine that the existing strategic roareas allocated in the LDP. The Llysworney Bypass has be now than it ever has been and it is absolutely essential as There is therefore a requirement to provide the Llysworne SP7 and MG20 which would remain unchanged by the inconceivable.	
3f - Please outline the changes you wish to see made to the D The Llysworney Bypass should be included in Policy SP7	
4b - If you wish to speak, please confirm which part of your rep	oresentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 483	6/DP1 Michael & Christin	e Slade						
Date Lodged Status Petition and 02/04/2012 M □ 0	No. Supporting Evidence	Additional SA SEA		Rep format: Letter	,	ur comments to be consie t a hearing session of Pub	•	•
2a - Do you consider the LDP is Sour		2b - If you think that th Procedural Tests -		does not not meet	` '	oundness, please indicate	which test(s) th	at it fails.
		Consistency Tests -	C1 - Unanswered	C2 - Unansw	vered C3 - Unanswe	ered C4 - Unanswer	red	
		Coherence and Effecti	iveness Tests - CE1	- Unanswered (CE2 - Unanswered (CE3 - Unanswered Cl	E4 - Unanswere	b c c c c c c c c c c c c c c c c c c c
3a - Which part of the Deposit Plan a	,	Policy Number: MG2(19). MG2(20)			Proposal Map:	<u>Constra</u>	aints Map	Appendices:
3b - Do you wish to see any changes	made to the Deposit Plan	as a result of your rep	resentation? Unansv	vered (If '	'No" or "Unanswered" -	go to 3d)		
3c - What changes would like to see r	made to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragraph: Unanswered	New Or Amended Site: Unanswered	Other (see Not Unanswered	<u>es):</u>
		Notes:						
3d - If your representation relates to	·	d site, did you submit t Site Name:	the site as a Candidate	Site? Unanswere	d (If "Yes", please	e give the Candidate Site Site Reference:	Name and refere	ence if known)

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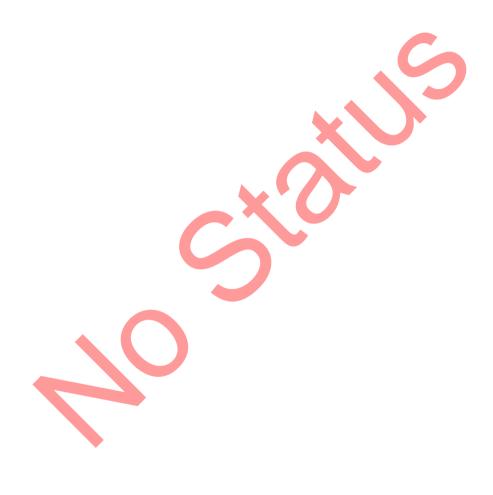
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic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

(ordered by Representation ID No.)

Representor ID and details: 4836/DP1 Michael & Christine Slade

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

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



Representor ID and details: 483//DP1 Phillip Thomas, F	erbert R Thomas						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0 ✓	Additional SA SEA		Rep format: Comment form			e consiered by 'written n of Public examination	•
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the I Procedural Tests -	Plan is unsound and d P1 - Unanswered	loes not not meet P2 - Unansv	` '	soundness, please	indicate which test(s)	that it fails.
	Consistency Tests - 0	C1 - Unanswered	C2 - Unansv	wered C3 - Unans	wered C4 - U	nanswered	
	Coherence and Effective	ness Tests - CE1 -	Unanswered	CE2 - Unanswered	CE3 - Unanswere	d CE4 - Unanswer	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:	7	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your repres	sentation? Yes	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	•		New Paragraph: Yes	Amended Paragrap Unanswered	New Or Amend Unanswered	ed Site: Other (see No Unanswered	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name: Land East o		Site? Yes	(If "Yes", plea	J	ate Site Name and refe ence: 2378/CS1, 2425	rence if known) 5/CS1, 2766/CS1 and 17
3e - Please set out your representation below:							
Policy MG5 - Affordable Housing, which requires ar least Association (Reference 2010/01341/FUL) which proposed The proposed site allocation for a larger area allows for a	d 16 affordable units on th	e eastern field parcel,	as a rural except	ions form of developm			
The Supporting Submission attached expands on the abo	ve.						
3f - Please outline the changes you wish to see made to the D Additional supporting text should be included in order to g which would provide for the consideration of elderly accor	ive an indication of the like	ely mix between interr					should be incorporated
4b - If you wish to speak, please confirm which part of your rep In order to respond to any objectors and support the Cour	·	•	about and why the	ey consider it be nece	ssary to speak at the	e hearing -	

Representor	ID and d	letails:	4837/D	P2 Phillip Thomas, F	lerbert R Thomas						
Date Lodged 02/04/2012		Petition	on and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Comment fo	·		e consiered by 'writte on of Public examinat	en representations' or do tion? Examination
2a - Do you co	onsider th	ne LDP	is Sound?	Sound	2b - If you think that the Procedural Tests -	he Plan is unsound a P1 - Unanswered		eet one or more test(s) onswered	of soundness, please	e indicate which test(s	s) that it fails.
					Consistency Tests -	C1 - Unanswered	d C2 - Una	nswered C3 - Unar	nswered C4 - L	Jnanswered	
					Coherence and Effect	tiveness Tests - Cl	1 - Unanswered	CE2 - Unanswered	CE3 - Unanswere	ed CE4 - Unansw	vered
3a - Which pa	rt of the I	Deposit	Plan are y	ou commenting on?	Policy Number:	<u>Paragr</u>	aph Number:	Proposal Map:		Constraints Map	Appendices:
					MG2(33)						
3b - Do you w	ish to see	e any cl	nanges ma	de to the Deposit Plar	as a result of your rep	presentation? No		(If "No" or "Unanswere	d" - go to 3d)		
3c - What cha	nges wo	uld like	to see mad	de to the Deposit Plan	? <u>New Policy:</u> Unanswered	Amended Policy: Unanswered	New Paragraph Unanswered	Amended Paragra Unanswered	aph: New Or Amend Unanswered	ded Site: Other (see Unanswere	
					Notes:						
3d - If your re	presenta	ation rela	ates to a no	ew, deleted or amende	ed site, did you submit Site Name: Land Ea		ate Site? Yes	(If "Yes", ple	· ·	late Site Name and regrence: 2378/CS.1, 2	eference if known) 425/CS.1, 2766/CS1 and 1
3e - Please s	et out yo	ur repre	sentation I	below:							
					gs with a requirement for the scheme within Phase			g. As such the requirem	nents of the allocatio	n as set out in the De	elivery and Implementation
See sup	porting in	nformati	on.								
		•	•		eposit Plan to make it ocation under Policy M	,	tion on the Proposa	als Map.			
,		′ '		' '	presentation you wish t		ctor about and why	they consider it be nece	essary to speak at th	ne hearing -	

Representor ID and details: 4837/DP3 Phillip Thomas, H	lerbert R Thomas		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		ments to be consiered by 'written representations' or do ring session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of soundne P2 - Unanswered	ess, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - L	Jnanswered CE2 - Unanswered CE3 -	Unanswered CE4 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
	MG8		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to	3d)
3c - What changes would like to see made to the Deposit Plan			Or Amended Site: Other (see Notes): nswered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Si Site Name: Land East of St Nicholas	ite? Yes (If "Yes", please give	the Candidate Site Name and reference if known) Site Reference: 2378/CS1, 2425/CS1, 2766/CS1 and 17
3e - Please set out your representation below:			
Policy MG8 - Housing Densities is generally acknowledge housing land supply calculations, it is difficult to be prescribed which will dictate the range of house types.	d. However, whilst the submission site is allocat iptive on numbers until a full assessment of site	ed for 50 dwellings, which would be consistent capacity is undertaken. This will be further influ	with the Polcy, and where firm figures are required for enced by market conditions and household need factors,
The attached Submission document refers.			
3f - Please outline the changes you wish to see made to the D It is therefore suggested that a new criterion, or one which		s follows:	
Reduced densities are required as a result of a full asses application stage."	sment of site characteristics and capacity, and p	revailing conditions which influence the range o	f house types. This will be determined at the planning
4b - If you wish to speak, please confirm which part of your re In order to respond to any objectors and support the Cou		about and why they consider it be necessary to	speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4838/DP1 Mrs J Shaughnes	sy					
Date Lodged 02/04/2012Status MPetition and No. DescriptionSupporting Evidence000	Additional SA SEA		Rep format: Letter	, ,	comments to be consiered a hearing session of Public	by 'written representations' or do examination?
2a - Do you consider the LDP is Sound? Unanswered	•		loes not not meet o P2 - Unanswe	` '	ındness, please indicate wh	nich test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unanswe	ered C3 - Unanswer	ed C4 - Unanswered	
	Coherence and Effectiv	eness Tests - CE1 -	Unanswered C	E2 - Unanswered CI	E3 - Unanswered CE4	- Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)	<u>Paragraph</u>		roposal Map:	Constraint:	s Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Unanswe	ered (If "N	No" or "Unanswered" - g	o to 3d)	
3c - What changes would like to see made to the Deposit Plan?	 		New Paragraph: Jnanswered		New Or Amended Site: O Unanswered U	ther (see Notes): nanswered
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	e site as a Candidate S	Site? Unanswered	(If "Yes", please o	give the Candidate Site Nar Site Reference:	me and reference if known)

3e - Please set out your representation below:

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

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

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

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

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

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

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

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

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

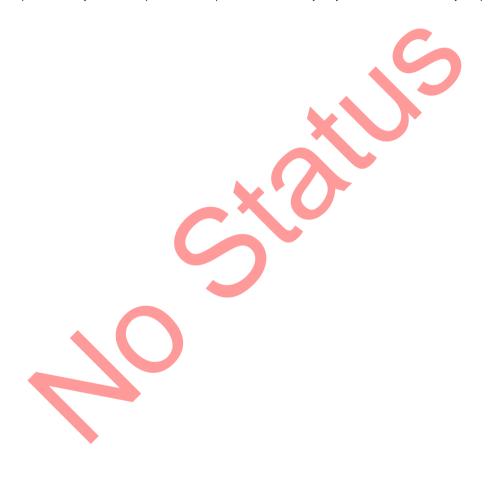
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4838/DP1 Mrs J Shaughnessy

I agree with everything in the above letter, especially regarding traffic.

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



(ordered by Representation ID No.)

Representor	ID and d	letails:	4839/DI	P1 Mr & Mrs G Fowle	er							
Date Lodged 02/04/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA		Rep forr Letter	nat:		,	pe consiered by 'written ion of Public examination	•
2a - Do you co	onsider ti	ne LDP	is Sound?		Procedural Tests - Consistency Tests -	P1 - Unans C1 - Unans	swered P2 -	Unanswe Unanswe	ered C3 - Unan	swered C4 - I	e indicate which test(s) Unanswered ed CE4 - Unanswe	
3a - Which pa	rt of the	Deposit	Plan are yo	· ·	Policy Number: MG2(19). MG2(20)		aragraph Number:		roposal Map:	7	Constraints Map	Appendices:
3b - Do you w	ish to se	e any ch	anges mad	de to the Deposit Plan	as a result of your rep	resentation?	Unanswered	(If "N	No" or "Unanswered	l" - go to 3d)		
3c - What cha	nges wo	uld like 1	to see mad	e to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Po Unanswered			Amended Paragra Unanswered	ph: New Or Amen Unanswered	ded Site: Other (see N Unanswered	
3d - If your re	presenta	ation rela	ates to a ne	·	d site, did you submit t Site Name:	the site as a Ca	andidate Site? Una	answered	(If "Yes", plea	ase give the Candid Site Refe	date Site Name and reference:	erence if known)
20 Diagon	ot out vo	ur ropro	contation b	olow:								

3e - Please set out your representation below:

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

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

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

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

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

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

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

(ordered by Representation ID No.)

Representor ID and details: 4839/DP1 Mr & Mrs G Fowler

As a resident of Southra Park in D.P I am writing my concern of the number of houses you wish to build in Dinas Powys. We have seen two accidents in the last six weeks probably eight in the last year. We try to get someone to work on time, it is more often than not impssoble Dinas Powys is no longer a village it's lost its beauty.

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

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



Representor ID and details: 4840/DP1 Axol Ltd, c/o Age	nt - Geraint John Plan	ning					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0 ✓	Additional SA SEA		Rep format: Comment form	·	•	o be consiered by 'writter ssion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	does not not meet P2 - Unansv	` '	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Yes	C3 - Una	answered C4	- Unanswered	
	Coherence and Effect	tiveness Tests - CE1 -	Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:		Constraints Map	Appendices:
	SP3						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If	"No" or "Unanswer	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	Unanswered		New Paragraph: Unanswered	Amended Parag Unanswered	raph: New Or Am Yes	ended Site: Other (see Unanswere	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site? Unanswere	ed (If "Yes", p	J	didate Site Name and re eference:	ference if known)
3e - Please set out your representation below: Please see attached correspondence.							
3f - Please outline the changes you wish to see made to the D please see attached correspondence.	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your re	,		,	ey consider it be ne	cessary to speak a	t the hearing -	

(ordered by Representation ID No.)

Representor	ID and o	details:	4840/D	P2 Axol Ltd, c/o Agen	t - Geraint John Plann	ning							
Date Lodged	Status	Petitio	on and No.	Supporting Evidence				Rep format: Comment forn	·	4a - do you want your comments to you want to speak at a hearing sess		,	•
02/04/2012	M	ш.	U 	✓	✓			Commention	n you want t				
2a - Do you co	onsider t	he LDP	is Sound?		•					est(s) of sound	ness, ple	ease indicate which test(s	s) that it fails.
					Procedural Tests -	P1 - Unan	swered	P2 - Unans	swered				
					Consistency Tests -	C1 - Unan	swered	C2 - Yes	C3 -	- Unanswered	C4	- Unanswered	
					Coherence and Effect	tiveness Tests	- CE1 -	Yes	CE2 - Yes	CE3	- Yes	CE4 - Yes	
3a - Which pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:	<u> </u>	Paragraph	Number:	Proposal Map			Constraints Map	Appendices:
					49								
3b - Do you w	ish to se	e any cl	hanges ma	de to the Deposit Plan	as a result of your rep	resentation?	Yes	(1	f "No" or "Unar	nswered" - go to	o 3d)		
3c - What cha	nges wo	uld like	to see mad	le to the Deposit Plan?	New Policy:	Amended P	olicy:	New Paragraph:	Amended F	Paragraph: Ne	w Or Am	ended Site: Other (see	Notes):
					Unanswered	Yes		Unanswered 📜	Unanswere	ed Ye	s	Unanswere	ed
					Notes:								
3d - If your re	presenta	ation rela	ates to a ne	ew, deleted or amende	d site, did you submit	the site as a C	Candidate	Site? Yes	(If "Ye	es", please give	e the Can	ndidate Site Name and re	eference if known)
					Site Name: Land to t	he rear of Hed	ol-Y-Felin I	Estate, Llantwit M	ajor		Site R	Reference: 2489/CS1	
						_			,				

3e - Please set out your representation below:

Land to the rear of Heol Y Felin Estate, Llantwit Major

This submission:

- supports the full allocation of a current 'reserve' housing allocation (MG2.15 Land to the rear of Heol Y Felin Estate, Llantwit Major)
- puts forward an Alternative Site Representation in relation to Candidate Site Reference 2489/CS.1; and -objects to selected policy provisions of the plan.

For the Alternative Site Representation, the following information is (as required) enclosed:

- a completed, signed and dated Deposit Plan Response Form;
- a plan of the site put forward for consideration:
- a Sustainability Appraisal of the alternative site put forward:

It should be noted that whilst this submission puts forward an alternative site submission (in relation to Candidate Site Reference No. 2489/CS.1) for a part of the reserve site MG2.15 (Land to the rear of Heol Y Felin Estate, Llantwit Major), this has been submitted without prejudice to our continued view that the optimum, preferred and most appropriate position is for the full allocation and un-reserving of the whole of the MG2.15 site – our justification for this is provided within the accompanying Annex.

The alternative site representation has been submitted through and as a result of dialogue with Officers from the Vale of Glamorgan Council for procedural reasons only, in order to give further flexibility to the LDP Inspector.

Accordingly, as outlined within our representations, the full allocation of the whole site (MG2.15) is the preferred and most appropriate option, and the alternative site submission is submitted purely for procedural necessity and as a contingency option (without prejudice to our considered position to the merits of the allocation of the whole site).

As an Annex to this letter, a detailed case (providing a critique of the current provisions of the plan and suggested changes to its content) is included, in support of, and to make the case for: the full allocation of the site, the Alternative site put forward and suggested changes to the provisions of the Plan's policies.

Further assessment work has been undertaken which further proves and supports the allocation of the site for residential development, the outcomes of which are detailed within the attached Annex and within

(ordered by Representation ID No.)

Representor ID and details: 4840/DP2 Axol Ltd, c/o Agent - Geraint John Planning

the Appendices to the Annex. It should be noted that whilst this assessment work has been undertaken principally in relation to the proposed Alternative site boundary (i.e. the land within our client's ownership – Candidate Site Reference No. 2489/CS.1), the findings are relevant to, and are similar for, the whole site (ref no. MG2.15), and therefore provides a positive picture and further justification for the allocation and un-reserving of the whole site.

The Annex addresses the following issues, and is structured accordingly:

Summary of the overall position adopted – as an executive summary of the case being made;

Consideration of housing supply by the Plan, at the overall / plan-wide area;

An Assessment of the Suitability of the Settlement for Development;

An Assessment of the Suitability of the Site for Development;

A Summary of the Suitability of Site for Development;

Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to endorse the allocation of the site put forward.

See attached supporting information

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

The candidate site reference 2489/CS1. This site is put forward as a contingency measure if the allocation of the site MG2.15 is deemed inappropriate.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - To relay the findings of detailed work undertaken and to put forward the issues contained within these representations.

Representor ID and details: 4840/DP3 Axol Ltd, c/o Age	nt - Geraint John Plannii	ng					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		Rep format: Comment form	·	•	be consiered by 'writter ssion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	e Plan is unsound and o	does not not meet P2 - Unansv	` '	of soundness, plea	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Yes	C3 - Una	nswered C4 -	Unanswered	
	Coherence and Effective	veness Tests - CE1 -	Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
	MG1			🔪 🔽			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Yes	(If	"No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? <u>New Policy:</u> Unanswered		New Paragraph: Unanswered	Amended Paragr Unanswered	raph: New Or Ame Yes	ended Site: Other (see I	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name:	ne site as a Candidate S	Site? Unanswer	ed (If "Yes", pl	J	didate Site Name and redeference:	ference if known)
3e - Please set out your representation below: Please see attached correspondence.							
3f - Please outline the changes you wish to see made to the D Please see attached correspondence.	eposit Plan to make it s	ound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	•		,	ey consider it be ned	cessary to speak a	t the hearing -	

Representor ID and details: 4840/DP4 Axol Ltd, c/o Ag	ent - Geraint John Plan	ning						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	e Additional SA SEA ✓		Rep format: Comment form	*	•	to be consiered by 'written ssion of Public examinati	•	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound and P1 - Unanswered	d does not not meet P2 - Unans	` '	of soundness, ple	ase indicate which test(s) that it fails.	
	Consistency Tests -	C1 - Unanswered	C2 - Yes	C3 - Una	answered C4	- Unanswered		
	Coherence and Effec	tiveness Tests - CE1	- Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	<u>oh Number:</u>	Proposal Map:		Constraints Map	Appendices:	
	MG2			🔏 😈				
3b - Do you wish to see any changes made to the Deposit Pla	an as a result of your re	oresentation? Yes	(If	"No" or "Unanswer	ed" - go to 3d)			
3c - What changes would like to see made to the Deposit Pla			New Paragraph: Unanswered			ended Site: Other (see I		
	Notes:							
3d - If your representation relates to a new, deleted or amend		the site as a Candidate the rear of Heol y Felin		· · · · · · · · · · · · · · · · · · ·	Ū	ndidate Site Name and re deference: MG2.15	ference if known)	
3e - Please set out your representation below: Please see attached correspondence - in relation to the	allocation of the site on	land to the rear of Hed	ol-y-Felin estate (MG	62.15) as a fully allo	cated, unreserved	site for residential develo	pment.	
3f - Please outline the changes you wish to see made to the Please see attached correspondence - full allocation of			te.					
4b - If you wish to speak, please confirm which part of your r	•		•	ey consider it be ne	cessary to speak a	at the hearing -		

Representor ID and details: 4841/DP1 Mr and Mrs Smith			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		ur comments to be consiered by 'written representations' or do t a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and or Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 -	P2 - Unanswered C2 - Unanswered C3 - Unansw	
	Policy Number: Paragraph MG2(19). MG2(20). MG11		Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswe	ered (If "No" or "Unanswered" -	go to 3d)
3c - What changes would like to see made to the Deposit Plan?	·	New Paragraph: Unanswered Amended Paragraph: Unanswered	New Or Amended Site: Other (see Notes): Unanswered Unanswered
3d - If your representation relates to a new, deleted or amende		Site? Unanswered (If "Yes", please	e give the Candidate Site Name and reference if known) Site Reference:
drive through Dinas Powys, using both the main road and is Dinas Powys expected to take? As it is, residents within the older part of the Village are all and Pen-y-Turnpike. Theses roads are subjected to streat particularly standing traffic, would exacerbate the potential Further, I am concerned that there have not been any prothe present demand and medical services are restricted downward. The Deposit plan does not indicate what measures will be trains will be a major challenge. Additional buses would sit is essential that major highway infrastructure improvements.	tion houses will be built on the St Cyres annex would have a profound and adverse impact or Barry Waterfront, to be built in the period from also through the village centre, down Mill Road ready affected at present by the amount of traffers of cars, particularly at peak times. Michaels polluting emissions from vehicles. Possed extra community facilities of substance, ue to the limitations of space at the Dinas Pow taken to encourage the availability and use of mply be caught up in the traffic chaos the extra ents are made BEFORE hundreds of additional	e and Caerleon Road. The 400 houses won the community as the existing roads are of the community and up Pen-y-turnpike. St. Andrews Road fic coming from the Barry direction that transton-le-Pit would also be affected at its junction-le-Pit would also be affecte	uld generate between 600 to 800 additional cars in both
I am also concerend about developments at Llandough H		he next 3 years.	
3f - Please outline the changes you wish to see made to the D	·/		
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector	about and why they consider it be necessary	ary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4842/DP1 Prof. Eric Whittle	& Patricia M Whittle					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter	, ,	our comments to be consict at a hearing session of Po	ered by 'written representations' or do ublic examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that th Procedural Tests -		does not not meet P2 - Unansw		f soundness, please indica	te which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	vered C3 - Unans	swered C4 - Unansw	ered
	Coherence and Effecti	veness Tests - CE1 -	Unanswered (CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)	<u>Paragraph</u>		Proposal Map:	<u>Const</u>	raints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your repr	resentation? Unanswe	ered (If '	'No" or "Unanswered	" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragray Unanswered	ph: New Or Amended Site Unanswered	e: Other (see Notes): Unanswered
	Notes:					
3d - If your representation relates to a new, deleted or amende	ed site, did you submit tl Site Name:	he site as a Candidate S	Site? Unanswere	ed (If "Yes", plea	ase give the Candidate Site Site Reference:	e Name and reference if known)

3e - Please set out your representation below:

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

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

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

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

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

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

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

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

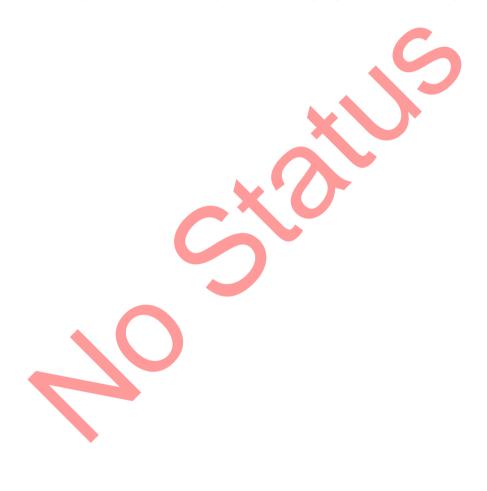
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic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

(ordered by Representation ID No.)

Representor ID and details: 4842/DP1 Prof. Eric Whittle & Patricia M Whittle

We fully endorse the above.

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



(ordered by Representation ID No.)

Representor ID and details: 4843/DP1 Nadine Adam	ms						
Date Lodged Status Petition and No. Supporting Evid 02/04/2012 M 0	dence Additional SA SEA		Rep format: Letter	•	your comments to be con k at a hearing session of I	nsiered by 'written representation Public examination?	s' or do
2a - Do you consider the LDP is Sound? Unanswered	•	the Plan is unsound and P1 - Unanswered	d does not not meet	` '	of soundness, please indic	cate which test(s) that it fails.	
		C1 - Unanswered tiveness Tests - CE1		vered C3 - Unan CE2 - Unanswered		wered CE4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting of	n? Policy Number: MG2(19). MG2(20).	,		Proposal Map:	<u>Cons</u>	straints Map Appendices	<u>:</u>
3b - Do you wish to see any changes made to the Deposit	Plan as a result of your rep	oresentation? Unans	wered (If '	"No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit	Plan? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	nph: New Or Amended Si Unanswered	ite: Other (see Notes): Unanswered	
3d - If your representation relates to a new, deleted or an	nended site, did you submit Site Name:	the site as a Candidate	e Site? Unanswere	ed (If "Yes", ple	ase give the Candidate Si Site Reference	ite Name and reference if knowr	1)

3e - Please set out your representation below:

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

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

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

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

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

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

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

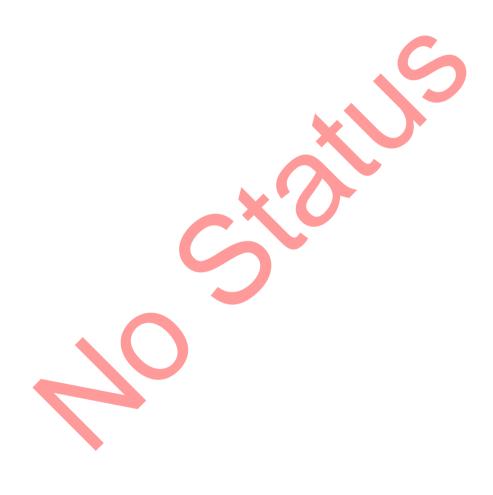
Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other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

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

(ordered by Representation ID No.)

Representor ID and details: 4843/DP1 Nadine Adams

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



Representor ID and details: 4844/DP1 Anna Davies	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	<u>Policy Number:</u> <u>Paragraph Number:</u> <u>Proposal Map:</u> <u>Constraints Map</u> <u>Appendices:</u>
	MG2(19). MG2(20)
3b - Do you wish to see any changes made to the Deposit Plan	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Unanswered
	Notes:
	d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Site Reference:
3e - Please set out your representation below: Vale of Glamorgan Deposit Local Development Plan 2011	- 2026
I refer to the above plan and my comments are as follows.	
As a resident of Dinas Powys I wish to express my concer	rns regarding the implications of the effect that the proposed additional housing would have on the local highways network.
	tion houses will be built on the St Cyres annexe and Caerleon Road. The 400 houses would generate between 600 to 800 additional cars in both would have a profound and adverse impact on the community as the existing roads are under great pressure now.
	Barry Waterfront, to be built in the period from now until 2020. It is inevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y-turnpike. St.Andrews Road and Britway Road will also be affected. How much more traffic
	ready affected at present by the amount of traffic coming from the Barry direction that travels on the alternative route through Station Road, Mill Road ms of cars, particularly at peak times. Michaelston-le-Pit would also be affected at its junction with the Pen-y-Turnpike Road. An increase in vehicles, I polluting emissions from vehicles.
	posed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for use to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.
	taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra mply be caught up in the traffic chaos the extra housing would cause.
It is essential that major highway infrastructure improvement	ents are made BEFORE hundreds of additional housing could even be considered.
3f - Please outline the changes you wish to see made to the De	
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 4845/DP1 Mr Gareth Davies	s, United Welsh Housing Association		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 ✓	Additional SA SEA		ents to be consiered by 'written representations' or do g session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and de Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of soundness P2 - Unanswered	s, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Yes	C2 - Yes C3 - Yes	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - L	Jnanswered CE2 - Yes CE3 - Un	answered CE4 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N		<u>Constraints Map</u> <u>Appendices:</u>
		the north and east of Dinas Powy	
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3d))
3c - What changes would like to see made to the Deposit Plan	? New Policy: Amended Policy: N		r Amended Site: Other (see Notes): Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate S Site Name:		Candidate Site Name and reference if known) ite Reference:
3e - Please set out your representation below: Policy MG22 states that the function of the green wedge i Unitary Development Plan for recreational use and green previous view that the land should be retained for recreati map clearly shows that the allocation of site MG2(20) for	wedge land, suggests that the Council considers onal use and as green wedge in order to preven	s the northward spread of Dinas Powys' urban area t the sprawl of Dina Powys towards Penarth. This	a to not be acceptable, this contrasts with the Council's change in approach is of concern as the proposals
Land east of Caerleon Road, Dinas Powys, is being prom being within the green wedge, however, the site contribute environmental, biodiversity or nature conservation interes anomaly in the green wedge and its removal from the green wedge and reflect the logical contributions.	es little to the openn <mark>ess of the ar</mark> ea between Din t and that it adjoins <mark>th</mark> e existing urban area of Di en wedge and subs <mark>eq</mark> uent inclu <mark>si</mark> on within the s	as Powys and Penarth and its inclusion within the nas Powys on three of its four boundaries and is th ettlement boundary of Dinas Powys will not have a	green wedge is unmerited given that the site is of no nerefore viewed from the urban context. The site is an
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
Proposed housing allocation MG2(20)- land off Caerleon the local area is identified within the later period of the pla openness and amenity value of land between Penarth and	n, the southern part of the site could remain for	using allocation and either wholly included within the housing development with the northern half of the	he green wedge or, alternatively, if a housing need for site identified as green wedge in order to maintain the
Land compromising alternative site submission 'land east the area between Dinas Powys and Penarth furthermore is site to the north, west and south. Its value to the green we Powys.	t has no environmental, nature conservation or a	amenity value. This site has a stronger association	with the adjacent residential area which borders the
4b - If you wish to speak, please confirm which part of your report to the nature of the representations outlined above.	presentation you wish to speak to the inspector a	about and why they consider it be necessary to spe	eak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4845/DP2 Mr Gareth Davie	s, United Welsh Housir	ng Association					
Date Lodged Status Petition and No. Supporting Evidenc	e Additional SA SEA		Rep format:	•			n representations' or de
02/04/2012 M 🔲 0			Comment forr	n you want to speal	k at a hearing sess	ion of Public examinat	ion? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	d does not not mee P2 - Unans	et one or more test(s) o swered	f soundness, pleas	se indicate which test(s	that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 -	Yes	
	Coherence and Effect	tiveness Tests - CE1	- Unanswered	CE2 - Yes	CE3 - Unanswe	red CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u> r	oh Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(20)			MG2(20)			
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your re	oresentation? Yes	(1	If "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plar	n? New Policy: Unanswered	Amended Policy: Yes	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amer Yes	nded Site: Other (see Unanswere	
	Notes:		Ť				
3d - If your representation relates to a new, deleted or amend	led site, did you submit Site Name:	the site as a Candidat	e Site? No	(If "Yes", plea	ase give the Candi Site Ref	date Site Name and re erence:	ference if known)
3e - Please set out your representation below:							
THE ALLOCATION OF HOUSING ON LAND AT CAERI SITE IS ALLOCATED FOR RECREATION USE WITHIN SITE LYING WITHIN THE GREEN WEDGE. THE DEPO IMPORTANCE OF THIS LAND FOR ITS RECREATION	I THE ADOPTED UNIT OSIT PLAN'S INTENT	TARY DEV <mark>ELOPMENT</mark> TO ALLOCATE THIS L	PLAN, WITH THE AND FOR HOUSI	NORTHERN PART OF NG REPRESENTS A S	F THE SITE AND SUDDEN AND UNA	THE SOUTHERNMOS	T SECTION OF THE GRADING IN THE
INTRODUCING HOUSING DEVELOPMENT ON THE E NOTABLE NORTHWARD EXTENSION OF THE URBAI SOUTHERNMOST PART OF THE SITE SHOULD BE IT POWYS.	NEDGE OF DINAS PO	WYS INTO LAND WH	ICH HAS PREVIO	USLY BEEN PROTEC	TED FROM DEVE	LOPMENT. AT MOST	ONLY THE
IT IS CONSIDERED THAT OTHER SMALLER SITES W	ITHIN THE BUILT-UP	AREA OR THOSE SM	ALL SITES WITH	A STRONGER RELAT	IONSHIP TO THE	URBAN EDGE OF DI	NAS POWYS SHOUL

IT IS CONSIDERED THAT OTHER SMALLER SITES WITHIN THE BUILT-UP AREA OR THOSE SMALL SITES WITH A STRONGER RELATIONSHIP TO THE URBAN EDGE OF DINAS POWYS SHOULD FIRST BE BROUGHT FORWARD FOR HOUSING DEVELOPMENT, SUCH AS 'LAND EAST OF CAERLEON ROAD, DINAS POWYS' WHICH IS BEING PROMOTED ON BEHALF OF UNITED WELSH HOUSING ASSOCIATION AS AN ALTERNATIVE SITE FOR AFFORDABLE HOUSING AND WHICH IS BOUNDED ON THREE SIDES BY EXISTING HOUSING.

THE ALLOCATION OF HOUSING ON 'LAND OFF CAERLEON ROAD' SHOULD BE REVIEWED. EITHER ONLY THE SOUTHERNMOST PART OF THE SITE SHOULD BE ALLOCATED FOR HOUSING WITH THE REMAINDER RETURNED TO THE GREEN WEDGE, OR THE SITE SHOULD BE IDENTIFIED AS A RESERVE HOUSING SITE, ONLY BROUGHT FORWARD FOR DEVELOPMENT ONCE OTHER, MORE PPROPRIATE HOUSING SITES WHICH DO NOT SIGNIFICANTLY ERODE THE GREEN WEDGE HAVE BEEN DEVELOPED, AND IF A NEED FOR HOUSING STILL EXISTS IN THE DINAS POWYS AREA TOWARDS THE END OF THE PLAN PERIOD.

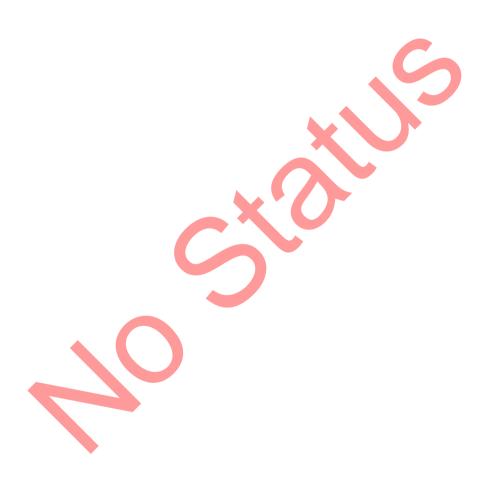
3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) POLICY MG 2 (HOUSING ALLOCATIONS) SHOULD BE AMENDED.

SITE 20 (LAND OFF CAERLEON ROAD, DINAS POWYS) SHOULD EITHER BE AMENDED TO SHOW ONLY THE SOUTHERNMOST PART OF THE SITE FOR HOUSING (AND THEREBY A REDUCED NUMBER OF HOUSING UNITS DELIVERED ON THE SITE) OR ALTERNATIVELY, THE SITE SHOULD BE IDENTIFIED AS A RESERVE HOUSING SITE WHICH IS ONLY DELIVERED IF HOUSING NEED STILL EXISTS IN THE AREA ONCE OTHER MORE APPROPRIATE HOUSING SITES WITHIN DIRECTLY ADJACENT TO THE SETTLEMENT BOUNDARY HAVE BEEN DELIVERED, SUCH AS LAND EAST OF CAERLEON ROAD, DINAS POWYS, WHICH IS BEING PROMOTED FOE INCLUSION WITHIN THE PLAN THROUGH THE NEW OR ALTERNATIVE SITE ASSESSMENT PROCESS.

(ordered by Representation ID No.)

Representor ID and details: 4845/DP2 Mr Gareth Davies, United Welsh Housing Association

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



Representor ID and details: 4845/DP3 Mr Gareth Davie:	s, United Welsh Housing Asso	ciation			_
Date Lodged Status Petition and No. Supporting Evidence M □ 0 ✓	e Additional SA SEA ✓	<u>Rep format:</u> Comment forn	· · · · · · · · · · · · · · · · · · ·	omments to be consiered by 'writter nearing session of Public examination	•
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests - P1 - Consistency Tests - C1 -	us unsound and does not not mee Unanswered P2 - Unans Unanswered C2 - Yes S Tests - CE1 - Unanswered	swered C3 - Yes	dness, please indicate which test(s) C4 - Yes - Unanswered CE4 - Yes	that it fails.
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: 89	Paragraph Number:	Proposal Map: extent of the settleme boundary to the north east o Powys	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your representa	ation? Yes	f "No" or "Unanswered" - go	to 3d)	
3c - What changes would like to see made to the Deposit Plan	? New Policy: Ame Unanswered Yes Notes:	nded Policy: New Paragraph: Unanswered	7 -	ew Or Amended Site: Other (see N Unanswered	
3d - If your representation relates to a new, deleted or amend	ed site, did you submit the site Site Name:	as a Candidate Site? No	(If "Yes", please giv	ve the Candidate Site Name and ref Site Reference:	erence if known)
3e - Please set out your representation below: THE SETTLEMENT BOUNDARY ON THE EASTERN SI PROMOTED AS A NEW / ALTERNATIVE HOUSING SITTHE LAND IS PROPOSED FOR INCLUSION WITHIN T	TE ON BEHALF OF UNITED \ HE GREEN WEDGE HOWEV	WELSH HOUSING ASSOCIATION ER, THE LOCATIONAL, PHYSIC,	N. AL, AND ENVIRONMENTAL	CHARACTER OF THE LAND HAS	A FAR STRONGER
ASSOCIATION WITH THE ADJACENT RESIDENTIAL/L AND THEREFORE BEING SEEN IN THIS URBAN CON INCLUSION OF THE LAND EAST OF CAERLEON ROA WILL NOT INCREASE THE COALESCENCE BETWEEI (POLICY MG2 (20)) AND THE CORRESPONDING EXTI NORTHWARDS AND WILL HAVE A DETRIMENTAL IM COALESCENCE BETWEEN DINAS POWYS AND PEN	TEXT. D, DINAS POWYS, WITHIN T N THE SETTLEMENTS OF DI ENSION OF THE SETTLEME PACT UPON THE OPEN CHA	THE SETTLEMENT BOUNDARY NAS POWYS AND PENARTH. IN	WILL NOT ADVERSELY AFF CONTRAST, THE ALLOCAT SITE WILL CLEARLY INCREA	ECT THE CHARACTER OF THE G FION OF LAND OFF CAERLEON F ASE THE URBAN EXTENT OF DIN	GREEN WEDGE AND ROAD, DINAS POWYS, IAS POWYS
3f - Please outline the changes you wish to see made to the E POLICY MG6 (RESIDENTIAL DEVELOPMENT IN KEY, CAERLEON ROAD, DINAS POWYS' WITHIN THE SET ASSOCIATION WITH THE ADJACENT BUILT FORM OI OPENNESS OF THE GREEN WEDGE BUT WILL INST THE SETTLEMENT BOUNDARY SHOULD BE AMENDE HOUSING SITE AS THE SITE REPRESENTS AN UNAC	SERVICE CENTRE AND PRI FLEMENT BOUNDARY. THIS IN THE EASTERN SIDE OF DI EAD REPRESENT A LOGICA ED TO EXCLUDE HOUSING S	MARY SETTLEMENTS) AND THE SITE SHOULD BE REMOVED FF INAS POWYS. ITS INCLUSION W L CONTINUATION OF THE SETT SITE MG2 (20), OR AT THE VERY	ROM THE GREEN WEDGE A /ITHIN THE SETTLEMENT B TLEMENT BOUNDARY WITH LEAST, INCLUDE ONLY TH	AS THE LAND HAS A DEFINITE PI BOUNDARY WILL NOT ADVERSEL IIN THIS PART OF DINAS POWYS HE SOUTHERNMOST PART OF TH	HYSICAL AND VISUAL LY AFFECT THE S. HIS PROPOSED
UP AREAS OF DINAS POWYS AND PENARTH. 4b - If you wish to speak, please confirm which part of your re Due to the nature of the representations outlined above.					SETWIEN THE DOILT

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

Representor ID and details: 4846/DP1 Lisa Mulachy	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Letter you want to speak at a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(19). MG2(20)
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below: Vale of Glamorgan Deposit Local Development Plan 2011 I refer to the above plan and my comments are as follows	
As a resident of Dinas Powys I wish to express my conce	erns regarding the implications of the effect that the proposed additional housing would have on the local highways network.
	lition houses will be built on the St Cyres annexe and Caerleon Road. The 400 houses would generate between 600 to 800 additional cars in both c would have a profo <mark>und and adv</mark> erse impact on the community as the existing roads are under great pressure now.
To add to that there are already 2000 houses approved at drive through Dinas Powys, using both the main road and is Dinas Powys expected to take?	t Barry Waterfront, to be built in the period from now until 2020. It is inevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y-turnpike. St.Andrews Road and Britway Road will also be affected. How much more traffic
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3f - Please outline the changes you wish to see made to the D	Deposit Plan to make it sound (if relevant)
	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4847/DP1 Denis Bolter				
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA	Rep format: Letter	4a - do you want your comments to be co you want to speak at a hearing session of	,
2a - Do you consider the LDP is Sound? Unanswered	Procedural Tests - P1 - Unanswered	P2 - Unanswe		.,,
	Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE		red C3 - Unanswered C4 - Unan E2 - Unanswered CE3 - Unanswered	CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragra MG2(19). MG2(20)		coposal Map: Co	nstraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unar	nswered (If "N	lo" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: Unanswered Unanswered Notes:	New Paragraph: Unanswered	Amended Paragraph: New Or Amended Unanswered Unanswered	Site: Other (see Notes): Unanswered
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candida Site Name:	ite Site? Unanswered	(If "Yes", please give the Candidate Site Reference	•

3e - Please set out your representation below:

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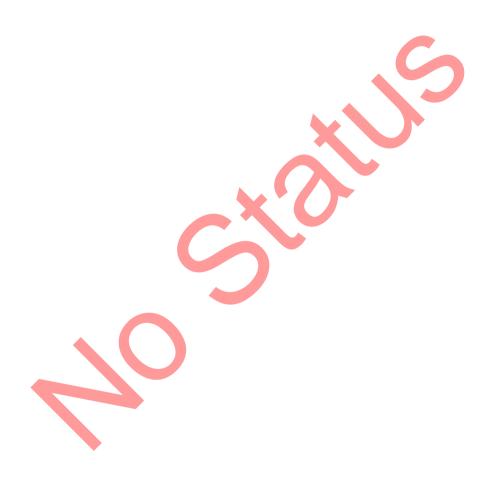
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(ordered by Representation ID No.)

Representor ID and details: 4847/DP1 Denis Bolter

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



(ordered by Representation ID No.)

Representor	ID and d	letails:	4848/DI	P1 Gillian Hopkins										
Date Lodged 02/04/2012	Status M	Petiti	on and No. 0	Supporting Evidence	Additional SA SEA			Rep format: Letter		4a - do you want you you want to speak a			•	representations' or do n?
2a - Do you co	onsider th	he LDP	is Sound?		2b - If you think that the Procedural Tests -					` '	oundness, pleas	e indicate	which test(s)	that it fails.
					Consistency Tests -	C1 -	Unanswered	C2 - Unar	nswere	d C3 - Unansw	vered C4 - U	Jnanswer	ed	
					Coherence and Effect	iveness	Tests - CE	1 - Unanswered	CE2	- Unanswered	CE3 - Unanswer	ed Cl	E4 - Unanswe	red
3a - Which pa	rt of the	Deposit	Plan are y	S	Policy Number: MG2(19). MG2(20).		<u>Paragra</u>	aph Number:	<u>Prop</u>	oosal Map:		Constra	iints Map	Appendices:
3b - Do you wi	ish to se	e any cl	nanges ma	de to the Deposit Plan	as a result of your rep	resenta	tion? Unan	swered	(If "No"	or "Unanswered"	go to 3d)			
3c - What cha	nges wo	uld like	to see mad	le to the Deposit Plan?	New Policy: Unanswered		nded Policy: nswered	New Paragraph: Unanswered	_	mended Paragraph Inanswered	New Or Amen Unanswered	ded Site:	Other (see N Unanswered	otes):
					Notes:					S				
3d - If your re	presenta	ation rela	ates to a ne	•	d site, did you submit t Site Name:	the site	as a Candida	te Site? Unansw	rered	(If "Yes", pleaso	e give the Candid Site Refe		Name and refe	erence if known)
									7					

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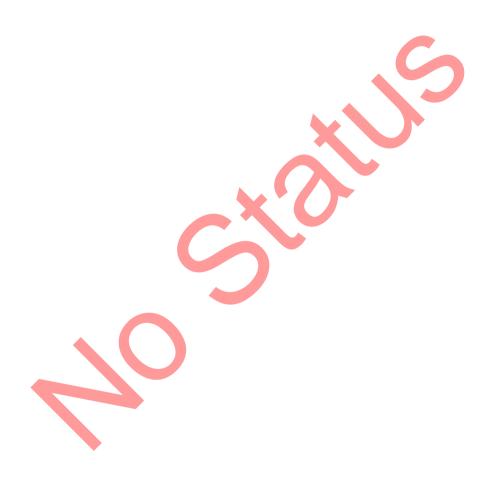
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(ordered by Representation ID No.)

Representor ID and details: 4848/DP1 Gillian Hopkins

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



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

Representor ID and details: 4849/DP1 N Keeping	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?
	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
, , , ,	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(19). MG2(20).
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	
	d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
In Dinas Powys it is proposed that a minimum of 400 addi directions, particularly at peak times. The additional traffic To add to that there are already 2000 houses approved at drive through Dinas Powys, using both the main road and is Dinas Powys expected to take? As it is, residents within the older part of the Village are all and Pen-y-Turnpike. Theses roads are subjected to strear particularly standing traffic, would exacerbate the potential Further, I am concerned that there have not been any projude the present demand and medical services are restricted do The Deposit plan does not indicate what measures will be	Ins regarding the implications of the effect that the proposed additional housing would have on the local highways network. It ion houses will be built on the St Cyres annexe and Caerleon Road. The 400 houses would generate between 600 to 800 additional cars in both would have a profound and adverse impact on the community as the existing roads are under great pressure now. Barry Waterfront, to be built in the period from now until 2020. It is inevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y-turnpike. St.Andrews Road and Britway Road will also be affected. How much more traffic ready affected at present by the amount of traffic coming from the Barry direction that travels on the alternative route through Station Road, Mill Road and so of cars, particularly at peak times. Michaelston-le-Pit would also be affected at its junction with the Pen-y-Turnpike Road. An increase in vehicles,
It is essential that major highway infrastructure improveme	ents are made BEFORE hundreds of additional housing could even be considered.
3f - Please outline the changes you wish to see made to the De	eposit Plan to make it sound (if relevant)
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4850/DP1 Thomas Martin						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter	, ,	ur comments to be cons at a hearing session of F	siered by 'written representations' or c Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Procedural Tests -		does not not meet P2 - Unansv	` '	coundness, please indic	ate which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansv	vered C3 - Unansw	vered C4 - Unansv	wered
	Coherence and Effective	veness Tests - CE1 -	Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N		Number: <u>Proposal Map:</u>		Cons	straints Map Appendices:
	MG2(19). MG2(20)					
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your repr	esentation? Unansw	rered (If	"No" or "Unanswered"	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph	n: New Or Amended Si	te: Other (see Notes):
	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered
	Notes:					
3d - If your representation relates to a new, deleted or amend	ed site, did you submit th	ne site as a Candidate	Site? Unanswere	ed (If "Yes", pleas	e give the Candidate Si	ite Name and reference if known)
	Site Name:				Site Reference	:

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

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

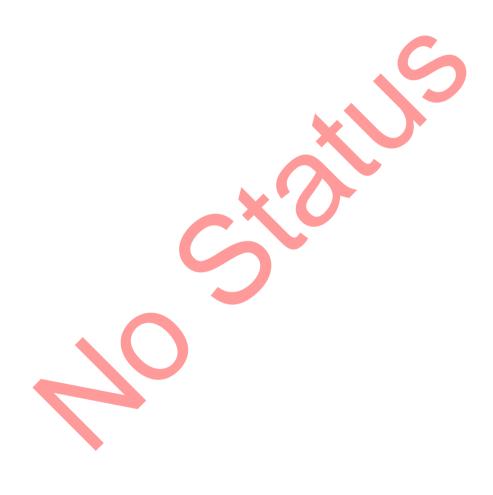
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(ordered by Representation ID No.)

Representor ID and details: 4850/DP1 Thomas Martin

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



(ordered by Representation ID No.)

Representor ID and details: 4851/DP1 Vivienne Martin				
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA	<u>Rep format:</u> Letter	4a - do you want your comments to be you want to speak at a hearing sessio	e consiered by 'written representations' or do n of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	,	Jnanswered P2 - Unansw		indicate which test(s) that it fails.
		ests - CE1 - Unanswered (
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)		Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation	on? Unanswered (If '	"No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amend Unanswered Unansw Notes:	ed Policy: New Paragraph: wered Unanswered	Amended Paragraph: New Or Amended Unanswered Unanswered	ed Site: Other (see Notes): Unanswered
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as Site Name:	s a Candidate Site? Unanswere	(If "Yes", please give the Candida Site Refer	ate Site Name and reference if known) ence:

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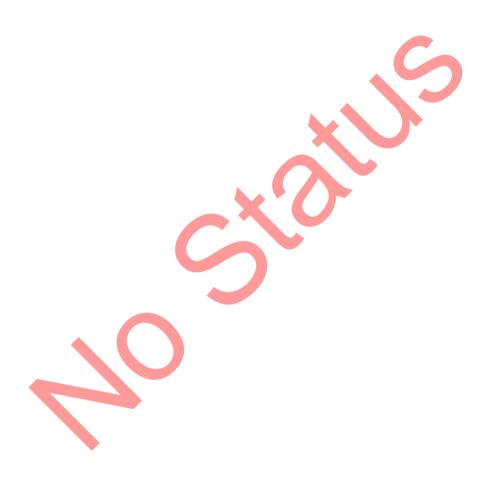
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(ordered by Representation ID No.)

Representor ID and details: 4851/DP1 Vivienne Martin

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



(ordered by Representation ID No.)

Representor ID and details: 4852/DP1 Lynne Lovell							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter	,	ur comments to be cons t a hearing session of P	•	•
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Procedural Tests -		does not not meet P2 - Unansv	one or more test(s) of s vered	oundness, please indica	ate which test(s) t	hat it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansv	vered C3 - Unansw	ered C4 - Unansw	vered	
	Coherence and Effective	veness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswere	∍d
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)			Proposal Map:	Cons	traints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Unansv	vered (If	"No" or "Unanswered"	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	P New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragraph Unanswered	: New Or Amended Sit Unanswered	e: Other (see No Unanswered	<u>ites):</u>
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	ne site as a Candidate	Site? Unanswere	ed (If "Yes", pleaso	e give the Candidate Sit Site Reference:	e Name and refe	rence if known)
On Plant and and an arrangement of the highest							

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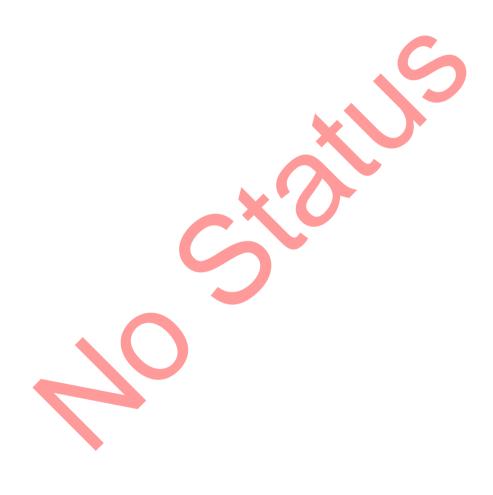
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(ordered by Representation ID No.)

Representor ID and details: 4852/DP1 Lynne Lovell

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(ordered by Representation ID No.)

Representor ID and details: 4853/DP1 Ralph Crockett							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter		ur comments to be constant a hearing session of F		
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Procedural Tests -		does not not meet o	` '	oundness, please indic	ate which test(s) t	hat it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	rered C3 - Unansw	rered C4 - Unansv	wered	
	Coherence and Effective	veness Tests - CE1	- Unanswered C	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswere	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)	<u>Paragraph</u>		Proposal Map:	<u>Cons</u>	straints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Unansw	vered (If "	'No" or "Unanswered"	go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragraph Unanswered	: New Or Amended Si Unanswered	te: Other (see No Unanswered	otes):
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Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

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

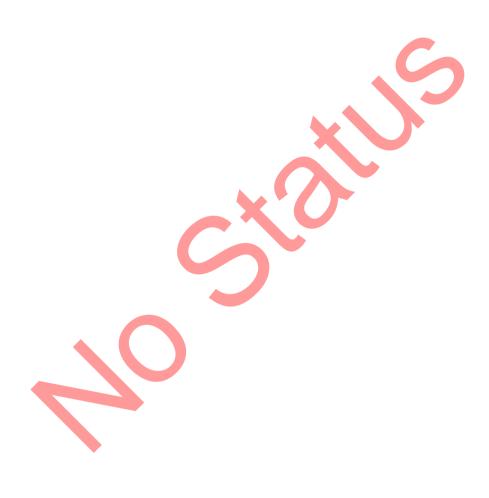
Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other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

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

(ordered by Representation ID No.)

Representor ID and details: 4853/DP1 Ralph Crockett

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



(ordered by Representation ID No.)

Representor ID and details: 4854/DP1 S Spear							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter		our comments to be con at a hearing session of F		
2a - Do you consider the LDP is Sound? Unanswered	•	ne Plan is unsound and P1 - Unanswered	does not not meet P2 - Unansv	, ,	soundness, please indic	ate which test(s)	that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansv	wered C3 - Unans	wered C4 - Unansv	wered	
	Coherence and Effecti	iveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	red
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)	Paragraph		Proposal Map:	<u>Cons</u>	straints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Unansw	vered (If	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended Si Unanswered	te: Other (see N Unanswered	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	he site as a Candidate	Site? Unanswer	ed (If "Yes", plea	se give the Candidate Si Site Reference		erence if known)

3e - Please set out your representation below:

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

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

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

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

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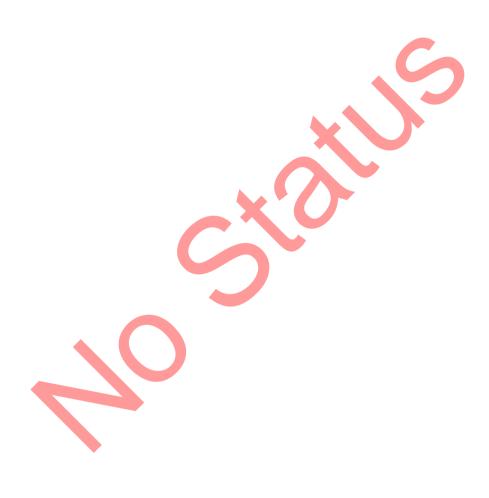
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(ordered by Representation ID No.)

Representor ID and details: 4854/DP1 S Spear

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



(ordered by Representation ID No.)

Representor ID and details: 4855/DP1 Anne & Anthony I	Nolan					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter	, ,	our comments to be cons at a hearing session of P	iered by 'written representations' or do ublic examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Procedural Tests -		does not not meet P2 - Unansw	` '	soundness, please indica	te which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	vered C3 - Unans	wered C4 - Unansw	ered
	Coherence and Effective	veness Tests - CE1 -	Unanswered (CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)	<u>Paragraph</u>		Proposal Map:	Const	raints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Unanswe	ered (If '	'No" or "Unanswered	" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan	New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragrap Unanswered	oh: New Or Amended Site Unanswered	e: Other (see Notes): Unanswered
	Notes:					
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	he site as a Candidate S	Site? Unanswere	ed (If "Yes", plea	se give the Candidate Site Site Reference:	e Name and reference if known)

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(ordered by Representation ID No.)

Representor ID and details: 4855/DP1 Anne & Anthony Nolan

As a resident of Cae Garw for the past 34 years, the volume of traffic has increased along Cardiff Road tenfold. It is impossible to turn left or right coming out of Southra Park from 7.15 a.m onwards. I have had to get out of my car whilst waiting in queue and press the pedestrian crossing button to halt the speeding traffic. Dinas Powys residents will be the ones to suffer with these proposals not Barry as they only have to drive a straight road.

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



(ordered by Representation ID No.)

Representor ID and details: 4856/DP1 Les Harris				
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA	<u>Rep format:</u> Letter	4a - do you want your comments to be c you want to speak at a hearing session of	onsiered by 'written representations' or do of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unso Procedural Tests - P1 - Unan Consistency Tests - C1 - Unan	swered P2 - Unanswe	ne or more test(s) of soundness, please incred red C3 - Unanswered C4 - Unan	
	Coherence and Effectiveness Tests			
3a - Which part of the Deposit Plan are you commenting on?	MC2(10) MC2(20)		roposal Map: Co	onstraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation?	Unanswered (If "N	lo" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended P Unanswered Unanswered Notes:		Amended Paragraph: New Or Amended Unanswered Unanswered	Site: Other (see Notes): Unanswered
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a C Site Name:	candidate Site? Unanswered	(If "Yes", please give the Candidate Site Referen	,

3e - Please set out your representation below:

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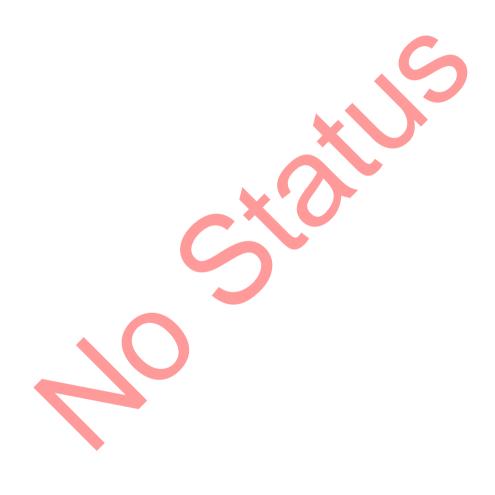
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(ordered by Representation ID No.)

Representor ID and details: 4856/DP1 Les Harris

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



Representor ID and details: 4857/DP1 Eileen Killen					
Date Lodged Status Petition and No. Supporting Evidence 26/02/2012 M 0	Additional SA SEA	<u>Rep format:</u> Email	4a - do you want your comments to you want to speak at a hearing ses		
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered	P2 - Unanswei	red	se indicate which test(s)	hat it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswe	red C3 - Unanswered C4 -	Unanswered	
	Coherence and Effectiveness Tests - CE1	- Unanswered CF	E2 - Unanswered CE3 - Unanswe	ered CE4 - Unanswer	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph	h Number: Pro	roposal Map:	Constraints Map	Appendices:
	MG2(4). MG2(7)				
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your representation? Unansw	wered (If "N	lo" or "Unanswered" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	New Policy: Amended Policy:Unanswered Unanswered	New Paragraph: Unanswered	Amended Paragraph: New Or Ame Unanswered Unanswered		otes):
	Notes:				
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site Name:	Site? Unanswered	` ' '	didate Site Name and refe	rence if known)
3e - Please set out your representation below: I am writing to express my total dismay at the the thought	of building 710 homes.				
Port Road is already a total nightmare to drive along.					
Barry town has more than enough new houses and I reall	y feel the new development is a bad move				
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)				
4b - If you wish to speak, please confirm which part of your rej	presentation you wish to speak to the inspecto	or about and why they	consider it be necessary to speak at	the hearing -	

Representor ID and details: 4858/DP1 Mr Kevin Hearne		
Date Lodged Status Petition and No. Supporting Evidence Add 02/03/2012 M 0		ant your comments to be consiered by 'written representations' or do beak at a hearing session of Public examination?
Proc Con	If you think that the Plan is unsound and does not not meet one or more test(sedural Tests - P1 - Unanswered P2 - Unanswered sistency Tests - C1 - Unanswered C2 - Unanswered C3 - U erence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswere	s) of soundness, please indicate which test(s) that it fails. nanswered C4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on? Police	cy Number: Paragraph Number: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan as a	result of your representation? Unanswered (If "No" or "Unanswered	ered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan? Ne Un	w Policy: Amended Policy: New Paragraph: Amended Para answered Unanswered Unanswered Unanswered	<u>igraph:</u> New Or Amended Site: Other (see Notes): Unanswered Unanswered
No	tes:	
3d - If your representation relates to a new, deleted or amended site	e, did you submit the site as a Candidate Site? Unanswered (If "Yes", Name:	please give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: OVERDEVELOPMENT AT WEYCOCK CROSS		
The recent outlined plans for development at the above are no	thing short of outrageous and totally unwarranted.	
Stealing even more green belt cannot be justified.		
The congestion in and around Port Road / Pontypridd Road is	unacceptable now without these wholly uneccessary properties.	
At a time of economic austerity when the Council bemoan the	ack of budget for roads, schools, hospital etc the last thing we want is additio	nal adopted roads to look after.
The density suggests box like properties on postage stamp plo	ts with very little parking - just look at Cwm Talwg etc to see the problems.	
It is time to work with what we have not add more of what the	oter does not want.	
The ruling or more appropriately uncumbent council- as they st	ruggle badly to rule anything- once again demonstrates their lack of understa	nding of what the community really needs.
3f - Please outline the changes you wish to see made to the Depos		
4b - If you wish to speak, please confirm which part of your represe	ntation you wish to speak to the inspector about and why they consider it be r	ecessary to speak at the hearing -

Representor	ID and d	letails:	4858/D	P2 Mr Kevin Hearne							
Date Lodged 01/04/2012		Petiti	on and No. 0	Supporting Evidence	Additional SA SEA		<u>Rep format:</u> Eform			o be consiered by 'writte ssion of Public examinati	
2a - Do you o	consider th	ne LDP	is Sound?	Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsour P1 - Yes	nd and does not not mee P2 - Yes	et one or more test(s)	of soundness, ple	ase indicate which test(s) that it fails.
					Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4	- Yes	
					Coherence and Effect	tiveness Tests -	CE1 - No	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which p	art of the I	Deposit	Plan are y	ou commenting on?	Policy Number:	<u>Par</u>	agraph Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you v	wish to see	e any c	hanges ma	ide to the Deposit Plan	as a result of your rep	resentation? Y	'es (If "No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plar			New Policy:	Amended Police	cy: New Paragraph:	Amended Paragr	aph: New Or Am	ended Site: Other (see	Notes):		
					Yes	No	No	No	No	No	
					Notes:						
3d - If your r	epresenta	ation rel	ates to a no	ew, deleted or amende	ed site, did you submit Site Name:	the site as a Can	didate Site? No	(If "Yes", ple	· ·	didate Site Name and re	ference if known)
3e - Please	set out yo	ur repre	esentation I	below:				,			
maximi	sing exsiti	ng hou		and improving that and						ely inappropriate. We sho ed consideration to the n	
3f - Please	outline the	change	es you wish	n to see made to the D	eposit Plan to make it	sound (if relevant	1)				
2. A full 3. Loca	blown rev	veiw of s should	road / rail ii d be fully er	fore proposing /snactc nfrastructure BEFORE ngaged in the process nded they act for us as	considering a LDP is before any plans are c	vital otherwise an onceived.	v. y plan is unsustainable.				
4b - If you w	rish to spe	ak, ple	ase confirm	n which part of your red	presentation you wish t	o speak to the ins	spector about and why t	they consider it be nec	essary to speak a	t the hearing -	

(ordered by Representation ID No.)

Representor	ID and d	etails:	4859/D	P1 Mr and Mrs Phillip	s									
Date Lodged 02/04/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA			Rep for Comme		· · · · · · · · · · · · · · · · · · ·	your comments to b		,	epresentations' or do ? Written
2a - Do you co	onsider th	ne LDP	s Sound?		2b - If you think that t Procedural Tests -		n is unsound ar Yes	d does not n P2 -		et one or more test(s) o	f soundness, please	indicate	e which test(s) the	hat it fails.
					Consistency Tests -	C1 -	Unanswered	C2 -	Yes	C3 - Yes	C4 - Y	es		
					Coherence and Effec	tivenes	s Tests - CE	1 - Yes		CE2 - Yes	CE3 - Unanswere	ed C	E4 - Unanswere	ed
3a - Which pa	rt of the I	Deposit	Plan are y	ou commenting on?	Policy Number:		<u>Paragra</u>	ph Number:		Proposal Map:		Constra	aints Map	Appendices:
					49		5.11			MG2 (ID30); Re allocations table (pag Supply Backgroudn P 2011)	e 145); Housing			Other - Not Listed
3b - Do you w	ish to see	e any ch	anges ma	de to the Deposit Plan	as a result of your rep	oresent	ation? Yes		(I	f "No" or "Unanswered	l" - go to 3d)			
3c - What cha	nges wo	uld like t	o see mad	le to the Deposit Plan?	New Policy: Unanswered Notes:	Ame Yes	ended Policy:	New Parac Unanswer		Amended Paragra Yes	ph: New Or Amend Yes	ded Site:	Other (see No Unanswered	<u>tes):</u>
3d - If your re	presenta	ition rela	ites to a ne	ew, deleted or amende	d site, did you submit Site Name: The Gar				S	(If "Yes", plea	ase give the Candid Site Refe		Name and refer	,
3e - Please s	et out vo	ur repre	sentation b	pelow:										

Please see attached representations.

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

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

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

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

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

(ordered by Representation ID No.)

Representor ID and details: 4859/DP1 Mr and Mrs Phillips

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

Summary

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

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

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

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

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

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

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' (strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+'

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(contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.

- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

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

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

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

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

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

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

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

Llangan primary school

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

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

Highway safety issues

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

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

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

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3.5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180.000 and No.8 has been on the market for £185.000.

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

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable housing on the site defies logic. At a rate of 3 5% this would only give 14 affordable houses - an increase of only 10 affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

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

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

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

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

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

The extant planning permission for the Garden Emporium site includes:

- a) a condition (condition 9) that a significant proportion of the site (approx. 30% being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all properties shall be located at least 10 metres from this boundary within the development site; and
- b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

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

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

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

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

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

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

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

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

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

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

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

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.
- "7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.
- "10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.
- TEST C5 The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).

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e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR - Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

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

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

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

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

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

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

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

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).

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

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

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

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

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Representor ID and details: 4859/DP2 Mr and Mr	s Phillips					
Date Lodged Status Petition and No. Supporting E 02/04/2012 M 0	vidence Additional SA SEA	Rep format: Comment form	, ,		e consiered by 'writter on of Public examination	representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests - P1 - Y		``			that it fails.
	Consistency Tests - C1 - Y Coherence and Effectiveness T		C3 - Yes CE2 - Yes	C4 - Y	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting	g on? <u>Policy Number:</u> MG9. MD12. MG2		Proposal Map: MG9)	Constraints Map Feb 2012	Appendices: Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Depo	sit Plan as a result of your representation	on? Yes (If	No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Depos	it Plan? New Policy: Amende Yes Notes:	led Policy: New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Ameno Yes	ded Site: Other (see N Unanswered	
3d - If your representation relates to a new, deleted or a	amended site, did you submit the site as Site Name: Land East of Llang		(If "Yes", plea	· ·	ate Site Name and ref	erence if known) MG 9 / ID 22 Appendix

3e - Please set out vour representation below:

The proposed Gypsy traveller site would be situated on a green field area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the councils own report – Fordham report).

I do not support this unfair proposal, the council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

Please see following detailed comments below.

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

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

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

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

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

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

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

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

Additional information attached:

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

TEST P1

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

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

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

TEST C1

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

TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.

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- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities:
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services

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surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

TESTC4

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

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

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

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

TEST CE1

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

- The Strategy makes the following statements:

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

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

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

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

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

Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it

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brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP

- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

TEST CE2

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

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

TEST CE3

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

TEST CE4

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

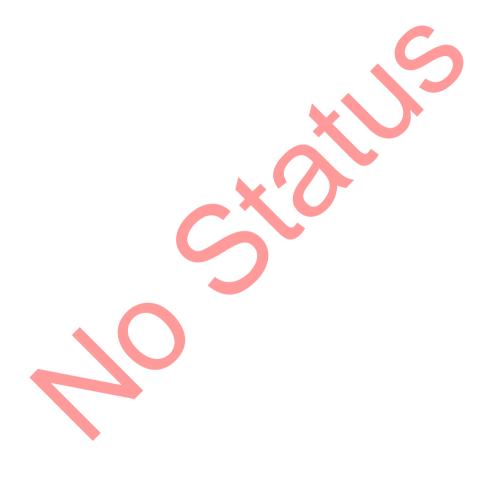
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The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

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

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



(ordered by Representation ID No.)

Representor ID and details: 4860/DP1 Mr Christopher E	vans		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA	Rep format: 4a - do you want your comments t Letter you want to speak at a hearing sea	o be consiered by 'written representations' or do ssion of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and d Procedural Tests - P1 - Unanswered	loes not not meet one or more test(s) of soundness, plea P2 - Unanswered	ase indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered C4 -	- Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Unanswered CE2 - Unanswered CE3 - Unansw	vered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph I	Number: Proposal Map:	Constraints Map Appendices: Aviation Safeguarding Zone
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswe	ered (If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan		Iew Paragraph: Amended Paragraph: New Or Amended Paragraph Junanswered Unanswered	
	Notes:		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate S Site Name:	· · · · · · · · · · · · · · · · · · ·	ididate Site Name and reference if known) eference:
3e - Please set out your representation below: Vale of Glamorgan LDP 2011 - 2026 Deposit Plan Consultation			
Thank you for consulting Defence Infrastructure Organisa	tion (DIO) on the above document which was re	ceived by this office 20th February 2011.	
The Vale of Glamorgan is captured by the published safe safeguarding for an appropriate assessment against St A		developments that infringe the safeguarding criteria with	nin this zone should be referred to DIO
I can therefore confirm that the MOD has no objection in	orincipal to the LDP. Please continue to consult	this relating to developments within the safeguarding c	consultation zone.
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspector a	about and why they consider it be necessary to speak a	it the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4861/DP1 Rhian Hill							
Date Lodged Status Petition and No. Supporting Evidence 27/02/2012 M 0	Additional SA SEA		Rep format: Email	, ,	it a hearing session o	f Public examination	n representations' or do on?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that t Procedural Tests -		d does not not mee	et one or more test(s) of s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unan	swered C3 - Unansw	ered C4 - Unan	swered	
	Coherence and Effec	tiveness Tests - CE	1 - Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	ered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragra	ph Number:	Proposal Map:	Co	onstraints Map	Appendices:
	MG2(28)				•••		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation? Unans	swered (If "No" or "Unanswered" -	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragraph Unanswered	: New Or Amended Unanswered	Site: Other (see N	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidat	e Site? Unanswe	ered (If "Yes", please	e give the Candidate Site Referenc		erence if known)
3e - Please set out your representation below: I have limited details to hand.							
I would like to appeal against 50 dwellings proposed for g The field runs behind St David's School Colwinston and to							
Reasons:							
 -highways in Colwinston is limited and the road access wi -Unless there is confirmation that NO and I mean NO pae playground. -This planning has been refused once green belt and consect that exerage household has 2 cars 50 dwellings and at a second refused once green belt and consect that exerage household has 2 cars 50 dwellings and at a second refused refused housing association houses built and ne builds in such a small village. If they want 50 dwellings put them on the A48 road behind 	dophiles will be allowed servation should nevel least 100 cars added to build is so high and they a lew builds at St Michael	ed to buy anyone of the role lifted and this is not to the village is not a gare too small to be see to close and The Vines	o exception. ood idea coming in an until it is too late. s in Colwinston and	and out of a small area.	-		-
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	resentation you wish	to speak to the inspect	tor about and why t	they consider it be necess	ary to speak at the he	earing -	

(ordered by Representation ID No.)

Representor	ID and d	letails:	4862/D	P1 Mr Nicholas Saal										
Date Lodged 02/04/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA			Rep form Commen			your comments to be k at a hearing session			
2a - Do you co	onsider tl	he LDP	is Sound?	Unsound	2b - If you think that the Procedural Tests -	the Plan P1 -		nd does not not P2 - Y		one or more test(s) o	f soundness, please	indicate	which test(s) tha	at it fails.
					Consistency Tests -	C1 -	Unanswered	C2 - Y	'es	C3 - Yes	C4 - Y	es		
					Coherence and Effect	tiveness	Tests - CE	1 - Yes		CE2 - Yes	CE3 - Unanswere	d CE	4 - Unanswered	
3a - Which pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:		Paragra	aph Number:		Proposal Map:		Constrai	nts Map	Appendices:
					49		5.11			MG2 (ID30); R allocations table (pag Supply Background F 2011)	e 145); Housing			Other - Not Listed
3b - Do you w	ish to se	e any ch	nanges ma	de to the Deposit Plan	as a result of your re	presenta	ation? Yes		(If	"No" or "Unanswered	d" - go to 3d)			
3c - What cha	nges wo	uld like	to see mad	de to the Deposit Plan?	? New Policy: Unanswered Notes:	<u>Amei</u> Yes	nded Policy:	New Paragra Unanswered		Amended Paragra Yes	<u>ph:</u> <u>New Or Amend</u> Yes		Other (see Note Unanswered	<u>es):</u>
3d - If your re	presenta	ation rela	ates to a ne	ew, deleted or amende	ed site, did you submit Site Name: The Gar					(If "Yes", ple	ase give the Candida Site Refe		Name and refere 130 in the drfat L	,
3a - Plasca c	et out vo	ur ronre	contation l	pelow:										

3e - Please set out your representation below:

Please see attached representations.

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

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

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

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

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

(ordered by Representation ID No.)

Representor ID and details: 4862/DP1 Mr Nicholas Saal

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

Summary

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

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

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

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

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

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

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' (strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning

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permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.

- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

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

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live-work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

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

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

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

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

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

Llangan primary school

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

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

Highway safety issues

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

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

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

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

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

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable housing on the site defies logic. At a rate of 3 5% this would only give 14 affordable houses - an increase of only 10 affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

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

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development should respect the character of the surrounding area and should be of appropriate scale and design.

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

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

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

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

The extant planning permission for the Garden Emporium site includes:

- a) a condition (condition 9) that a significant proportion of the site (approx. 30% being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all properties shall be located at least 10 metres from this boundary within the development site; and
- b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

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

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

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

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

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

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

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

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

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

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

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

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.
- "7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.
- "10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.
- TEST C5 The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).

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e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR - Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

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

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

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

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

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

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

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

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability,

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lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).

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

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

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

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

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Date Lodged Status Petition 02/04/2012 M	and No. Supporting Evidence 0	Additional SA SEA		Rep format: Comment form	·		o be consiered by 'writter ssion of Public examinati	•
2a - Do you consider the LDP is		2b - If you think that the Procedural Tests -		l does not not meet P2 - Yes	one or more test(s) o	f soundness, plea	ase indicate which test(s) that it fails.
		Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 -	· Yes	
		Coherence and Effectiv	eness Tests - CE1	- Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?		Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
		MG9. MD12. MG2	6.49. 6.5	2. 7.41. 7.44.	MG9		Feb 2012	Appendix 9 - Supporting Documents
3b - Do you wish to see any cha	inges made to the Deposit Plan	as a result of your repre	esentation? Yes	(If	"No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to	see made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Yes	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Ame Yes	ended Site: Other (see I Unanswere	
3d - If your representation relation		d site, did you submit th Site Name: Land East		Site? Yes	(If "Yes", ple	J	didate Site Name and re	ference if known) e MG 9 / ID 22 Appendix 1

3e - Please set out your representation below:

The proposed Gypsy traveller site would be situated on a green field area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the councils own report – Fordham report).

I do not support this unfair proposal, the council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

Please see following detailed comments below.

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

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

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

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

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

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

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

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

Additional information attached:

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

TEST P1

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

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

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

TEST C1

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

TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.

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

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

- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4.1 of PPW:
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide:
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

TESTC3

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

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regard to the Wales Spatial Plan.

TESTC4

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

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

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

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

TEST CE1

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

- The Strategy makes the following statements:

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

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

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

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

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

Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being

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assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP

- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

TEST CE2

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

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport."

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

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

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

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

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

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

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor

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accommodation can prevent access to services and so cannot be seen in isolation."

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

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

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

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

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

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

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

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

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

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

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

TEST CE3

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

TEST CE4

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

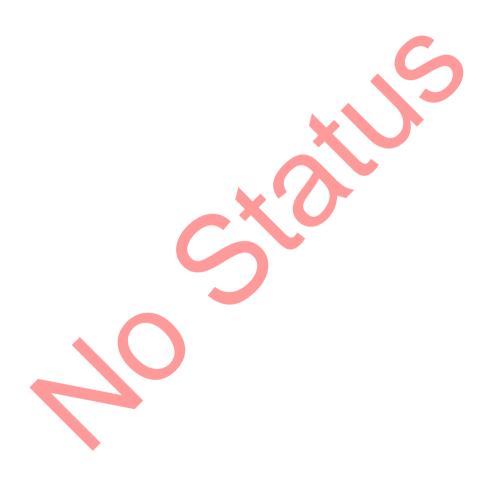
The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

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

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



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Representor ID and details: 4863/DP1 Mr & Mrs Hemmin	ngs								
Date LodgedStatusPetition and No.Supporting Evidence14/03/2012M0	Additional SA SEA		Rep format: Comment form	· · · · · · · · · · · · · · · · · · ·	our comments to be co at a hearing session of	•	•		
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound and o	does not not meet P2 - Unansw	` '	soundness, please indi	icate which test(s)	that it fails.		
	Consistency Tests - C1 - Yes C2 - Unanswered C3 - Unanswered C4 - Unanswered								
	Coherence and Effect	iveness Tests - CE1 -	Unanswered (CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	red		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number: F	Proposal Map:	Cor	nstraints Map	Appendices:		
	MG2(15)		ľ	MG2					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If '	"No" or "Unanswered	" - go to 3d)				
3c - What changes would like to see made to the Deposit Plan'	Unanswered		New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended S Yes	Site: Other (see N	lotes):		
3d - If your representation relates to a new, deleted or amende		the site as a Candidate S ear of Heol-y-Felin est <mark>at</mark>		(If "Yes", plea	se give the Candidate Site Referenc		erence if known)		

3e - Please set out your representation below:

We have viewed the plans and documents relating to the local development plan (LDP) and in particular to the proposed site MG2(15), land to the rear of Heol-y-Felin estate, Llantwit Major.

We feel site MG2(15) should be deleted from the Ldp at this early stage and set out our representation below.

The site is unsuitable due to the increased density of traffic which would be generated, in that the proposed access to the site directs traffic past three schools, a church, a leisure centre and access roads to a number of existing estates, through already busy junctions. Observation of the area by the schools at school opening and closing times should be done as a priority. The road in this area is particularly overstretched and dangerous, particularly to the school children.

Llantwit Major is a small country town and should not be treated the same as a large inner city whe4re there is often no option but to direct traffic by education and leisure facilities. The proposed restricted and substandard access via Nant-yr-Adar would create a potentially dangerous crossroad intersection in what is now a quiet street. The proposed access runs between two houses. There is a lack of vision and a bridge to constructed over the stream would cause irreparable damage to mature trees and the Hoddnant stream.

A secondary access via Bouvier Farm was mentioned by the officers at a local exhibition. Apart from not being mentioned in the LDP and therefore rendering the plan misleading, this access appears to be hopelessly inadequate in highway and traffic terms.

Site MG2(15) appears to fall within the boundary of the Glamorgan Heritage Coast and forms a strong natural green backcloth to existing development. The Hoddnant stream forms a clear and logical natural boundary to development and removal of mature trees and damage to the stream due to the necessary bridge work would be a tragedy which could not be remedied.

It is also thought locally that the land may contain features of great archaeological interest.

Both the proposed new estate and the Heol-y-Felin estate will be at risk of flooding. The Hoddnant is already at capacity in heavy rain but to this time has always managed to carry the water away from the houses. Paving of site MG2(15) (a very large area, currently green fields with wildflowers) above the stream will remove the soak-away facility before water reaches the stream. It is not thought any artificial construction by developers would be able to compensate for this. Some areas of site MG2(15) are already indicated as being in a flood zone. Subsequent costs to council and developers of legal action when flooding occurs could be substantial.

The sewage system in the area is already overloaded and has blocked on previous occasions.

There is the possibility of anti-social problems if the brook is left as a narrow open space between two estates along with the potential danger to children which council and developers will be unable to deny previous knowledge of.

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The local Primary school is already at overcapacity and this will feed through to the Comprehensive.

It appears little thought has gone into the proposed development of site MT2 (15) which will benefit nobody other than the landowner.

In general there seems to be no justification for extending Llantwit Major even more than has been the case over the past few decades. A full and detailed assessment needs to be made of the potential impact on local services, particularly education and health facilities which are already severely overstretched.

I would be grateful if you could confirm receipt of our representation in due course and also confirm that our objections will be reported to your Council Cabinet when the LDP is considered.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) Deletion of site MG 2 (15) - land to rear of Heol-y-Felin estate Llantwit Major from the Plan.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

Representor	ID and d	etails:	4864/D	P1 Mrs Joanna Saal											
Date Lodged 02/04/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA				Rep format: Comment for			your comments to be k at a hearing session			epresentations' or do ? Written
2a - Do you co	onsider th	ne LDP i	s Sound?		2b - If you think that t Procedural Tests -			nd and	does not not me P2 - Yes	et one	or more test(s) o	of soundness, please	indicate	which test(s) t	hat it fails.
					Consistency Tests -	C1 -	Unansw	ered	C2 - Yes		C3 - Yes	C4 - Y	es		
					Coherence and Effec	tivenes	s Tests -	CE1	- Yes	CE2	2 - Yes	CE3 - Unanswere	d Cl	E4 - Unanswere	ed
3a - Which pa	rt of the I	Deposit	Plan are y	ou commenting on?	Policy Number:		<u>Par</u>	agrapl	n Number:	Prop	oosal Map:		Constra	aints Map	Appendices:
					49		5.1 ⁻	1		allo					Other - Not Listed
3b - Do you w	ish to see	e any ch	anges ma	de to the Deposit Plan	as a result of your rep	oresenta	ation? Y	es		(If "No	or "Unanswere	d" - go to 3d)			
3c - What cha	nges wo	uld like t	o see mad	le to the Deposit Plan?	New Policy: Unanswered Notes:	Ame Yes	nded Polic	<u>cy:</u>	New Paragraph: Unanswered	. 7	Amended Paragra /es	naph: New Or Amend Yes	ed Site:	Other (see No Unanswered	otes):
3d - If your re	presenta	ition rela	ites to a ne	ew, deleted or amende	d site, did you submit Site Name: The Gar						(If "Yes", ple	ease give the Candida Site Refe		Name and refe D30 in the draft	,
3e - Please s	et out vo	ur repre	sentation h	elow:											

Please see attached representations.

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

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

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

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

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

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Representor ID and details: 4864/DP1 Mrs Joanna Saal

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

Summary

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

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

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

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

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

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

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' (strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning

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permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.

- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

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

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live-work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

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

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

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

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

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

Llangan	

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

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

Highway safety issues

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

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

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

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

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

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable housing on the site defies logic. At a rate of 3 5% this would only give 14 affordable houses - an increase of only 10 affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

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

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development should respect the character of the surrounding area and should be of appropriate scale and design.

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

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

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

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

The extant planning permission for the Garden Emporium site includes:

- a) a condition (condition 9) that a significant proportion of the site (approx. 30% being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all properties shall be located at least 10 metres from this boundary within the development site; and
- b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

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

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

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

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

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

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

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

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

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

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

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

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.
- "7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.
- "10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.
- TEST C5 The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).

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e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR - Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

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

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

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

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

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

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

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

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability,

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lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).

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

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

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

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

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Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA	Rep format: Comment form	· · · · · · · · · · · · · · · · · · ·	ur comments to be consiered by 'writ at a hearing session of Public examin	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is u Procedural Tests - P1 - Ye		one or more test(s) of s	soundness, please indicate which tes	t(s) that it fails.
	Consistency Tests - C1 - Ye	s C2 - Yes	C3 - Yes	C4 - Yes	
	Coherence and Effectiveness Tes	sts - CE1 - Yes	CE2 - Yes	CE3 - Yes CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
	MG9. MD12. MG2	6.49. 6.52. 7.41. 7.44.	MG9	Feb 2012	Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation	? Yes (If	"No" or "Unanswered"	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Unanswered Yes Notes:	<u>New Paragraph:</u> Unanswered	Amended Paragraph Unanswered	n: New Or Amended Site: Other (se Yes Unanswe	<u> </u>
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Site Name: Land East of Llanga		(If "Yes", pleas	e give the Candidate Site Name and Site Reference: Site Refere	reference if known) nce MG 9 / ID 22 Appendix 1

3e - Please set out vour representation below:

The proposed Gypsy traveller site would be situated on a green field area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the councils own report – Fordham report).

I do not support this unfair proposal, the council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

Please see following detailed comments below.

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

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

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

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

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

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

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

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

Additional information attached:

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

TEST P1

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

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

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

TEST C1

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

TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.

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

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

- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4.1 of PPW:
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site:
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site, and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

TESTC3

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

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TESTC4

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

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

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

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

TEST CE1

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

- The Strategy makes the following statements:

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

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

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

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

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

Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

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

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- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

TEST CE2

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

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

TEST CE3

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

TEST CE4

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

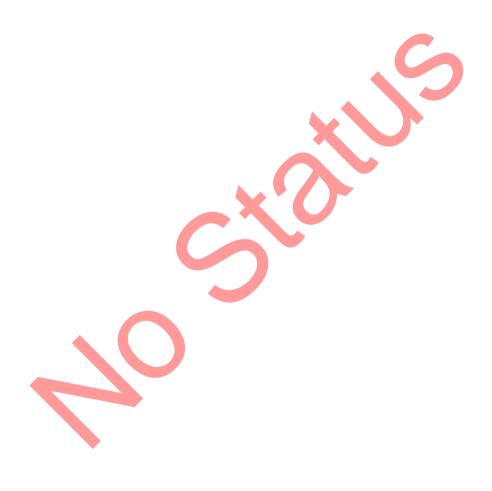
The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

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

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



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Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		Rep format: Letter		our comments to be consider at a hearing session of Pul	ored by 'written representations' or oblic examination?	do
2a - Do you consider the LDP is Sound? Unanswered	•	P1 - Unanswered	P2 - Unansv	` '	soundness, please indicate	` '	·
		iveness Tests - CE1 -			CE3 - Unanswered C	·	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: SP9. MG24	<u>Paragraph</u> 		Proposal Map:	Constra	aints Map Appendices:	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Unansw	ered (If	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	? New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragraph Unanswered	n: New Or Amended Site: Unanswered	Other (see Notes): Unanswered	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site? Unanswere	ed (If "Yes", pleas	e give the Candidate Site Site Reference:	Name and reference if known)	
3a - Places set out your representation below:							

Representations on behalf of Hanson regarding Policies SP9 (mineral allocations) and MG24 (mineral safeguarding) with specific reference to Forest Wood and Lithalun guarries.

Hanson wishes to object to the lack of areas identified for both mineral allocations and safeguarding areas within the Vale of Glamorgan Local Development Plan 2011-2026, with particular reference to two of its

Hanson Operates two sites at:-

- 1 Forest Wood quarry, south of Llanharry
- 2 Lithalun quarry south of Bridgend

Both of these sites are operational and have permitted mineral reserves however, they will need further permissions towards the end of the plan period. Logical extensions for both sites are proposed as part of this objection and in Hanson's view, these should be protected for future mineral working

The potential extension areas of concern abut existing planning permission areas and need to be protected now as the opportunity to extend both quarries in other directions is restricted due to a variety of constraints such as the presence of public roads, a SSSI and other environmental issues. Hanson considers that it is appropriate to allocate Preferred Areas (as described in Para. 14 of MPPW) within which extensions to each of its two quarries could be accommodated in order to ensure flexibility in the plan for the provision of future aggregate supplies to meet society's need.

In the event that the council is still minded to proceed with its plan without allocating any further mineral sites, then these potential extension areas should, in the very least, be identified as safeguarded minerals.

Policy SP9 Objection

Hanson objects to policy SP9 on the basis that the policy is not sound by virtue of:-

SP9- Objections

Consistency Test C2 as the policy does not properly reflect the MPPW (see below) aim to provide the mineral resources to meet society's needs;

Coherence Test CE1 as the policy seeks to avoid allocating new reserves whilst the authority's Minerals Background Paper (see below) notes serious problems with productive capacity in the existing landbank

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and supply chain upon which its non allocation policy approach is reliant.

Coherence Test CE4 as the plan allocates no new mineral working areas and safeguards very few others despite recognising the productive capacity in the plan is at significant risk and that the volume of reserves in the Vale is at the limit of acceptability (see below: South Wales RTS - page 90).

SP9-Discusssion

Mineral Planning Policy Wales - December 2000 (MPPW)

MPPW aims to provide positively for the working of mineral resources to meet society's needs through, as far as practicable, the identification of areas for future working where this can be undertaken in a sustainable way; and to safeguard deposits of minerals from permanent development that would prevent or hinder their subsequent extraction for future generations

Regional Technical Statement (RTS), South Wales Regional Aggregates Working Party, October 2008

Box 1 in Section 4.17 of the RTS makes it clear that the guidance deals with the apparent requirements for crushed rock but does not take full account of matters that might be material in ensuring an adequate supply of aggregates.

Four bullet points set out what these material issues might be and includes, at bullet point four, reference to productive capacity.

The RTS advises (page 90 paragraph 6) that whilst taken together Bridgend and the Vale of Glamorgan have adequate permitted reserves, the Vale of Glamorgan is close to the limit of 15 years of planned reserves applied as the minimum requirement in the RTS.

The Draft Local plan does not seek to allocate new reserves because of the extant planned reserves, however as the Vale of Glamorgan is close to the limit of having less than adequate reserves, Hanson considers this position to be a very inflexible approach to aggregate supply. It is therefore appropriate to provide for the release of more reserves to build in flexibility of supply during and beyond the plan period.

Future Productive capacity

The Vale of Glamorgan's Minerals Background Paper (November 2011) makes it clear (at paragraph 4.5) that 50% of productive capacity in the Vale comes from Wenvoe quarry and that this site will be exhausted by 2016. In paragraph 8.2, it seems that further extensions to Wenvoe are unlikely as a result of issues with European Protected species.

Paragraph 8.3 of the Mineral Background Paper suggests that there are serious environmental constraints to new quarry sites coming forward to replace Wenvoe and on that basis, no new allocations are proposed.

Paragraph 4.5 of the Minerals Background Paper makes it clear that existing sites are expected to pick up the shortfall in productive capacity once Wenvoe ceases production although it is unclear if these sites have the ability to do so. It seems at least likely, that productive capacity in the Vale will fall by approximately 50% post 2016 and that if other operators do absorb this capacity, then their existing permitted reserves will be depleted more quickly than they previously envisaged.

Proposed New Allocations - Lithalun and Forest Wood quarries.

The Vale of Glamorgan UDP (policy Min 2 and 3) protected areas at Forest Wood and Lithalun quarries for mineral extraction. New permissions now exist at both sites but the principle of protecting future quarrying areas adjacent to these sites remains important in light of the potential changes to productive capacity that the Minerals Background Paper highlights (at para 4.2).

The allocation of additional minerals therefore needs to be rolled forward in order to maintain the ability to provide longer term supplies (throughout the plan period) from both Forest Wood and Lithalun quarries to absorb some of the loss of productive capacity once Wenvoe ceases production.

In these circumstances, it is essential (in accordance with MPPW paragraph 14) that the development plan makes it clear as to where mineral extraction should or is most likely to take place, in order that aggregate supplies can meet society's needs.

SP9 -Conclusions

Hanson concludes that policy SP9 does not satisfy the aims of MPPW as it fails to allocate new mineral sites where there are recognised deficiencies in the existing reserves and productive capacity. It is difficult to see how the Vale of Glamorgan can claim to be providing minerals to meet society's needs when it is allocating no new sites, safeguarding very few areas of limestone resources and is relying on existing reserves and productive capacity which are known to be respectively near to their minimum acceptable limits or could reduce substantially in the relatively near future.

Policy SP 9 should be amended to allow further allocations to be made to provide flexibility to the landbank.

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Further Preferred Areas are proposed below at both Forest Wood and Lithalun quarries.

Lithalun Quarry - Proposed Preferred Area

Hanson considers that a Preferred Area should be allocated (or at the very least – safeguarded) and should be shown on the proposals map to protect limestone to the west of the existing permitted quarry limits at Lithalun quarry in order to protect future reserves that will be required towards the end of, and beyond, the current plan period. This is particularly important as the area identified (see yellow area on the aerial photograph above) represents the only reasonable extension to the existing quarry. Land to the south of Lithalun quarry is affected by the Old Castle Down SSSI and is therefore environmentally sensitive; Land to the north is occupied by the mature Kings Wood and land to the east has already been excavated.

Securing the only remaining reserves is therefore essential for the future of Lithalun quarry and local limestone supplies in general.

The Preferred Area suggested has been drawn in recognition of the fact that this area of limestone resources could be won from either Pant Quarry and/or Lithalun Quarry, with an adequate nature conservation corridor being maintained to prevent coalescence of the two working areas.

Forest Wood Quarry

There is no allocation or safeguarded area in the plan at Forest Wood quarry.

A recent permission at the site provides for 20 years plus of mineral extraction at current output levels but the site's longer term life beyond that is less clear. This site is particularly important as it is one of the closest operational sites to Cardiff city and provides not only aggregate, but also ready mixed concrete and coated roadstone. The site is an important provider of construction materials to the urban area. The anticipated changes in productive capacity in the area as a result of the potential closure of Wenvoe quarry could lead to increases in output at Forest Wood resulting in more rapid depletion of the permitted reserves.

An allocation of a preferred area for a future extension to the site is therefore essential to maintain future supplies of aggregate in this area. The loss of a major supplier to the local market means that the remaining operational sites increase in importance to the local economy and therefore need to be fully and properly protected to maintain long term supplies.

Hanson would like to see a Preferred Area for an extension to the Forest Wood site or at the very least have an area properly safeguarded for future mineral development in the longer term. Such an area is shown shaded yellow on the photograph above.

Policy MG 24 - Safeguarding - Objection

Hanson objects to policy MG 24 as it fails to properly safeguard limestone mineral resources as required by MPPW Paragraphs 12 and 13. The policy is not therefore sound. Hanson relies on the following tests:-

MG24 – Objection

Consistency Test C2 as the policy does not properly reflect MPPW requirement to safeguard mineral resources to meet society's needs. The plan has safeguarded some areas of limestone but not others, without any evidenced explanation as to why.

Coherence Test CE1 as the policy safeguards some land but not other, without defining why (for example land between Pant and Lithalun guarries)

Coherence Test CE2 – the safeguarding policy has made a broad assumption that most limestone minerals are not worth safeguarding because of the existence of long term permitted reserves but then undermines this by highlighting issues of productive capacity and ignores RTS advice that reserves are close to the limit of being adequate.

Coherence Test CE4 as the plan allocates no new mineral working areas and safeguards very few areas despite recognising the productive capacity in the plan is at significant risk. As the RTS advises that the volume of reserves in the Vale is at the limit of acceptability this does not provide for a flexible approach to mineral supply.

MG24 - Discussion

Mineral Planning Policy Wales (MPPW)

The need for mineral safeguarding is defined in Mineral Planning Policy Wales (MPPW) in paragraphs 12 and 13. Defining Safeguarded Minerals Paragraph 12 acknowledges that minerals can only be worked where they are found and that local planning authorities should safeguard potential primary land won resources for future generations. Paragraph 13 goes on to confirm that it is important that access to mineral

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deposits which society may need is safeguarded and that areas to be safeguarded should be identified on proposals maps. This policy advice is acknowledged at Para. 5.72 of the Draft LDP. Environmental Impacts in Safeguarded areas.

MPPW makes the point in paragraph 13 that safeguarding does not provide any guarantee that safeguarded minerals will be worked. MPPW merely requires that minerals capable of being worked are recorded and shown on the proposals map for protection. Environmental constraints are not an issue that needs to be considered in safeguarding, as those are issues to be addressed in more detail at a later specific site allocation or application stage.

The aim of safeguarding lies in the fact that minerals can only be worked where they occur and for those reasons such minerals should be protected from permanent development, regardless of what the planning merits of working them might be.

Consistency of Approach

The Draft Local Development Plan fails to achieve a consistent approach to mineral safeguarding as it identifies safeguarded minerals in some limited cases, but not in others without explaining why. The correct approach in Hanson's view is to safeguard all limestone reserves in the Vale based on the BGS mapping. Hanson's concerns arise due to the lack of any allocation or safeguarding at its Lithalun and Forest Wood quarries despite competitor quarries being granted safeguarded status. This approach does not seem to follow any consistent approach.

Environmental Impacts

The principle of safeguarding is also addressed in SP9 (as well as MG24) with the aim of safeguarding of resources of Limestone....where these could be worked in the future without unacceptable detriment to the environment or residential amenity. Paragraph 5.72 of the LDP then expands on the aims of safeguarding policy. In particular, it states:-

Whilst Carboniferous and Liassic limestone are widespread in the Vale of Glamorgan, the potential for working further areas without undue detriment to the environment or amenity once existing permitted reserves are exhausted is limited.

No justification is put forward to support this claim which seems to be based on a general presumption that minerals cannot be worked without undue detriment to the environment, which is not correct.

As mentioned above safeguarding does not require minerals to be assessed for environmental acceptance as it is clear that safeguarding provides no guarantee that the minerals can be worked. Safeguarding is about protecting potential mineral reserves from other forms of development, it is not about the promotion or prevention of minerals development.

MG24(3) - Safeguarded Areas

Policy MG24 identifies safeguarding for three limestone sites, item 2 of which relates to land to the northwest of Pant Quarry close to Lithalun guarry.

It is not clear why the MG 24 (2) site has been drawn linking to Pant quarry but no area has been safeguarded that links to the neighbouring Lithalun quarry, less than 100m away and seemingly subject to identical environmental considerations. This makes the plan inconsistent especially when the whole area sits within a joint Lithalun / Pant Buffer zone as per MG25.

The safeguarded area in MG 24(2) attributes the safeguarding area to Tarmac's Pant quarry but the area could also be easily worked from Lithalun quarry. Reference to Tarmacs Pant quarry should therefore be removed.

In summary, Hanson considers that safeguarding should be based on the BGS mapping of the limestone reserve and that all sites should be appropriately safeguarded not just a few individual randomly favoured locations.

Hanson - Objection to Policies SP9 and MG 24

In summary MPPW Paragraphs 13 and 14, require mineral planning authorities to provide for the working of mineral resources to meet society's needs. In doing so, the council should identify such resources on their proposals map. The LDP does not allocate any new reserves and seeks to safeguard only limited reserves for a handful of operating sites on the basis that mineral working is not environmentally acceptable elsewhere in the county. This is not flexible, sustainable nor in accordance with MPPW.

The plan and its supporting documents recognise the Vale of Glamorgan is an important supplier of construction materials; that productive capacity will be halved in 2016 when Wenvoe quarry becomes exhausted, but then fails to provide in a meaningful way for alternative long term supplies in light of that.

The guidance to MPA's on apportionment provision calculations in the RTS (page 79) ignores issues such as productive capacity but the LDP Minerals Background Paper makes it clear that this is a major material consideration 1 in the Vale of Glamorgan. There is an apparent reliance on increased output at other permitted sites to absorb this capacity, but this will result in faster reserve depletion in those remaining sites, assuming of course that those sites have the physical capability of absorbing the extra capacity in the first place. There is no indication as to how this increased output will be secured in policy.

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This faster depletion of existing planned reserves should therefore justify the allocation of extensions to operating sites that might be required to increase output to higher levels than were envisaged. Furthermore if these sites cannot or do not absorb the spare capacity, the Vale will inevitably be unable to provide adequately for society's needs, as required in MPPW.

Safeguarding is not intended to provide allocations as it does not imply an acceptance that minerals will be worked. However, it does seek to protect known occurrences of potentially viable mineral resources, especially where there is a proven track record of need. It is Hanson's view that the limestone reserves in the Vale should be safeguarded as a whole. This approach has been taken in other areas of South Wales and further afield in England and is consistent with BGS advice on the matter in England.

Hanson's Lithalun and Forest Wood sites lie close to centres of population and as such can provide for society's aggregate needs using existing transportation links. Minerals are wasting assets and over time, both sites will move to a point where further planning permissions are needed. Whilst this will not be necessary immediately, it is essential that future accessible reserves are identified and made available in line with the requirements of MPPW.

Hanson has proposed two areas that should be allocated as Preferred Areas in the LDP or at the very least be specifically safeguarded.

In its current form, the plan is neither consistent with national policy nor coherent with regards to mineral provision, and it is, therefore, not sound.

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

(ordered by Representation ID No.)

Representor ID and details: 4866/DP1 Anthony J Baker	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Email you want to speak at a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(11)
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Notes:
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below: I object to this proposal for the reasons stated below:	
Cowbridge is a market town and without its market it will I stock. The current users are willing to invest in the site if	ose its identity and heritage. It will lose trade, market town activity and parking on non market days. Local farmers will lose the facility of trading their hey are given a proper lease.
The site was originally provided for Cowbridge by the peo Council property department, it is wanted by us, the peop	ple of Cowbridge and is part of the Town's historical identity. The site is not, I say again, not, surplus to requirements as stated by the Vale of Glamoragn le of Cowbridge.
This decision, by people passing through the corridors of should not be allowed to proceed.	power for this short period of time, will destroy our ancient town's identity and charm forever. It is typical of selling the family silver for short term gain and
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)
4b - If you wish to speak, please confirm which part of your rel	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4867/DP1 Mrs Michelle J Doran		
Date Lodged Status Petition and No. Supporting Evidence Ac 02/04/2012 M □ 0 □	Email	4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?
Pro Con	- If you think that the Plan is unsound and does not not mee ocedural Tests - P1 - Unanswered P2 - Unans	et one or more test(s) of soundness, please indicate which test(s) that it fails. swered swered C3 - Unanswered C4 - Unanswered
	icy Number: Paragraph Number: 62(19). MG2(20)	Proposal Map: Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan as a		If "No" or "Unanswered" - go to 3d)
-	ew Policy: Amended Policy: New Paragraph: nanswered Unanswered Unanswered otes:	Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered
3d - If your representation relates to a new, deleted or amended sit	te, did you submit the site as a Candidate Site? Unanswe	(If "Yes", please give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: Housing at St Cyres Annexe and Caerleon Road, Dinas Powys "Vale of Glamorgan Deposit Local Development Plan 2011 —		y
To whom it may concern,		
	ch side of the community which is served by only two access	Dinas. It is proposed that a minimum of 400 additional houses will be built on the St s points to the main road [A4055]. Both these junctions, namely the Infants School traffic ect.
The 400 houses would generate between 600 to 800 additional existing roads are under great pressure now.	al cars <mark>in b</mark> oth d <mark>ire</mark> ctions, p <mark>art</mark> icularly at peak times,. The ad	dditional traffic would have a profound and adverse impact on the community as the
public transport; medical services are restricted due to the limithe additional houses has not been adequately considered esp	itations of space at the Dinas Powys Surgery premises on Opecially when considered with the additional houses planned	n does not indicate what measures will be taken to encourage the availability and use of Cardiff Road and the capacity of the local schools to accommodate the extra pupils due to do in the south east area of the Vale. Much of this traffic will be funnelled through Dinas ernock and the land adjacent St Josephs' School, Sully Road will only add to the existing
		maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase monoxide] and Particulates [PM105] are not available but need clarifying.
It is essential that major highway infrastructure improvements	are made BEFORE hundreds of additional housing could e	even be considered.
3f - Please outline the changes you wish to see made to the Depos		
4b - If you wish to speak, please confirm which part of your represe		hey consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4868/DP1 PropInvest Brook	lands R.P. Ltd						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	,	ur comments to be cons t a hearing session of P	•	•
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	ne Plan is unsound and de P1 - Unanswered	P2 - Unansw	vered	· ·		nat it fails.
		C1 - Unanswered tiveness Tests - CE1 - U			rered C4 - Unansw CE3 - Unanswered		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph N	Number: F	Proposal Map:	Cons	traints Map	Appendices:
			F	Non allocation of Retail Park, Culverhous retail purposes.			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Unanswe	red (If	'No" or "Unanswered" -	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	? New Policy: Unanswered Notes:		lew Paragraph: Inanswered	Amended Paragraph Unanswered	: New Or Amended Sit Yes	te: Other (see No Unanswered	tes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit s Site Name:	the site as a Candidate S	ite? No	(If "Yes", pleaso	e give the Candidate Sit Site Reference:	te Name and refer	ence if known)
3e - Please set out your representation below:							

VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN

REPRESENTATIONS TO DEPOSIT DRAFT IN RESPECT OF BROOKLANDS RETAIL PARK, CULVERHOUSE CROSS

On behalf of our client, Proplayest Brooklands R.P. Limited, WYG is instructed to submit representations to the Deposit Draft of the Vale of Glamorgan Local Development Plan (LDP).

The representations concern the Brooklands Retail Park, Culverhouse Cross and are contained within this correspondence and attached form.

The Retail Park consists of five individual units. These are currently occupied by Curry's, Allied Carpets and PC World with the remaining units vacant. The Park forms part of the established retail location of Culverhouse Cross. It is located south of the Culverhouse Cross roundabout and occupies a gateway location to the Vale of Glamorgan. The Park is flanked by Port Road to the west, the A4232 to the north and Brooklands Terrace to the south.

CURRENT LDP POSITION RELATIVE TO THE SITE

In the emerging LDP, Brooklands Retail Park is not allocated for any specific use (that is, it is white land) on the Proposals Map.

In terms of the Written Statement, Policies SP6, MG16 and MG17 appear to be the most relevant, as these relate directly to retail. In addition, a number of the LDP Strategic Objectives, as well as general policy on new development and place making (Policies MD1 – 3) have a bearing on the site's consideration.

OUR CLIENT'S POSITION AND POLICY COMMENTARY

It is our client's view that Brooklands Retail Park should be allocated for retail purposes. This is in order to reflect its current role within the wider retail location of Culverhouse Cross. Further, such an allocation should assign the Park for open A1 retail uses.

In these terms, our client wishes to draw the Council's attention to the following points (which supports the view expressed above):

- Brooklands Retail Park is an established retail location;
- The retail allocation of the Park accords with LDP Deposit Draft policy; and

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• The provision of suitable, viable and flexible space to meet occupier demand should be encouraged.

Brooklands Retail Park is in an established retail destination

Brooklands Retail Park is one of four retail parks at Culverhouse Cross. The Parks encompass a range of units and occupiers. The Deposit Draft acknowledges that Culverhouse Cross is a major out of centre Retail Park and is an important retail attraction in its own right. Despite this, it would appear that this significance is not reflected in policy.

It is now considered that - given the breadth, size and range of units at Culverhouse Cross (including Brooklands Retail Park) - the time has come to recognise the area in policy terms. For instance, the numerous planning permissions and appeal decisions would suggest that policymakers have accepted that the locale has an overriding retail purpose.

Consequently, it is our client's view that the LDP should now acknowledge Brooklands Retail Park (as part of the wider Culverhouse Cross area) as a retail allocation, for open A1 retail uses, in the Proposals Map and Written Statement.

The Retail Allocation of the Park accords with LDP Deposit Draft Policy

The proposed retail allocation of Brooklands Retail Park would accord with the guidance currently set out in the LDP Objectives, as well as in the Strategic and Managing Growth policies. If the Park were to be allocated for open A1 uses, it would increase its attractiveness to a wider range of occupiers. This would raise the potential for vacant units to be bought back quickly and easily into viable re-use thus allowing the re-occupation of existing structures on developed land, in an accessible retail location. In addition, it would justify further expenditure on the Park, by our client, to improve its appearance and attractiveness to potential occupiers and visitors.

In these terms, the proposed change would be in accordance with the LDP Objectives relative to fostering a sustainable local economy (Objective 8) and ensuring that development uses land effectively (Objective 10). This is because it would allow for the more effective re-use of previously developed land, which, in turn, would promote the use of sustainable transport modes and encourage new enterprises. It would also directly meet the requirements set out in Policy SP6. This policy states that opportunities for the effective use of vacant floorspace and refurbishment of retail properties should be maximised, alongside measures to improve the public realm and access to such sites. Further, the new investment on the Park would also enhance its appearance and allow the Park to make a positive contribution to the surrounding built environment, thereby according with Policies MD2 and MD3.

The allocation of the Park for retail use would allow LDP objectives and general policies to be met. Therefore, further consideration should be given to changing the Proposals Map and Written Statement.

The provision of suitable, viable and flexible space to meet occupier demand should be encouraged.

Our client has ascertained that potential occupiers would be interested in taking units at the Park, if there were to be a change in its LDP allocation. As stated, this could lead to further investment in the Park, which would mean that it would continue to provide attractive and viable retail space within an appropriate setting. This is important given the gateway location of the Park.

However, if no change is made, the concern is that the Park's current non-allocation could compound the present situation and mean that more units become vacant. The lack of flexibility to attract new occupiers - as a consequence of the restricted nature of the current permission - is likely to impact on our client's investment strategy. This will have a further adverse effect on the Park's appearance and mean that a vicious circle is created.

Proposed Amendment

Based on the foregoing commentary, our client suggests the following amendments to the Deposit Draft:

- Allocate Brooklands Retail Park for retail purposes (Open A1 retail) in the LDP Proposals Map; and
- Provision should be included within Policy MG17 to recognise the role of Brooklands Retail Park (and the wider Culverhouse Cross area) within the retail heirachy.

Summary

Our client, PropInvest Brooklands R.P Limited, considers that Brooklands Retail Park has an important role to play in the current retail provision in the Vale of Glamorgan, and that this role should be reflected formally within local planning guidance. To allow our client the flexibility to attract new occupiers and encourage further investment, it it therefore suggested that the area is allocated for retail purposes in the Proposals Map and that the accompanying policies in the Written Statement should be amended to reflect this change.

3f - I	Please outline the changes you wi	sh to see made to	the Deposit F	Plan to make	it sound (if	relevan
	PROPOSED AMENDMENT					

(ordered by Representation ID No.)

Representor ID and details: 4868/DP1 PropInvest Brooklands R.P. Ltd

Based on the foregoing commentary, our client suggests the following amendments to the Deposit Draft:

- Allocate Brooklands Retail Park for retail purposes (Open Al retail) in the LDP Proposals Map; and
- Provision should be included within Policy MG17 to recognise the role of Brooklands Retail Park (and the wider Culverhouse Cross area) within the retail hierarchy.

SUMMARY

Our client, Proplnvest Brooklands R.P. Limited, considers that Brooklands Retail Park has an important role to play in the current retail provision in the Vale of Glamorgan, and that this role should be reflected formally within local planning guidance. To allow our client the flexibility to attract new occupiers and encourage further investment, it is therefore suggested that the area is allocated for retail purposes in the Proposals Map and that the accompanying policies in the Written Statement should be amended to reflect this change.

Our client looks forward to receiving the Council's response on the matters raised above.

However, in the meantime, if the Council has any queries or requires further information, please do not hesitate to contact me.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing We wish to speak at the Hearing sessions(s) in respect of retail matters in order to assist the Inspector in examining the retail strategy which, on the one hand, recognises the Culverhouse Cross location as a significant retail attraction, while on the other hand making no policy provision for it.

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Representor ID and details: 4869/DP1 Messrs C & V Brown	ewer		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0		Comment form you want to speak at a h	omments to be consiered by 'written representations' or do nearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered		
	Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - U		d C4 - Unanswered 3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N MG4 7.21		Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	ı as a result of your representation? No	(If "No" or "Unanswered" - go	to 3d)
3c - What changes would like to see made to the Deposit Plan		Unanswered Unanswered U	ew Or Amended Site: Other (see Notes): nanswered Unanswered
3d - If your representation relates to a new, deleted or amende		ite? Unanswered (If "Yes", please giv	ve the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: INTRODUCTION			
Local Development Plan 2011 – 2026 (LDP) as a Strateg 1.2 The subject site extends to some 8.47 hectares (20.9)	ic Housing Site under Policy MG 2. 3 acres) of grassland in two fields and is within the Strategic Opportunity Area and is located to the	he settlement boundary of St Athan, the east	ern boundary being Gileston Road and the southern e St Athan County Junior and Infants School. The northern
1.3 The site is currently divided into two fields by a relict be sporadic bushes (see Figure 4).	nedgerow which has <mark>su</mark> ffered m <mark>an</mark> y years of dam	nage through livestock walking through the ur	fenced division with the result of a hedge line comprising
1.4 The two fields have been listed in the Candidate Sites recognises the St. Athan area as a key development opportunity.		entified as being suitable for the erection of a	t least 250 dwellings. The Council's Draft Preferred Strategy
1.5 St Athan has been identified in The Welsh Assembly These are considered to be towns capable of becoming in			three Strategic Opportunity Areas within South East Wales.
2.0 Planning Policy Context and St Athan Background	•		
National Planning Policy			
2.1 Planning Policy Wales (PPW) 2011 states that Local agenda and emerging priorities in Wales.	Planning Authorities should consider the Wales	Spatial Plan when preparing their Local Plan	s in order to reflect the national sustainable development
2.2 Paragraph 4.4.2 states that			
"Planning policies and proposals should:			

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Representor ID and details: 4869/DP1 Messrs C & V Brewer

- Promote resource-efficient and climate change resilient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl.......
- Locate developments so as to minimise the demand for travel, especially by private car;
- Support the need to tackle the causes of climate change by moving towards a low carbon economy.......;
- Minimise the risks posed by, or to, development on, or adjacent to, unstable or contaminated land and land liable to flooding....;
- Play an appropriate role to facilitate sustainable building standards...;
- Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities.....
- Contribute to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems....;
- Help to ensure the conservation of the historic environment and cultural heritage....;
- Maximise the use of renewable resources....:
- Encourage opportunities to reduce waste and all forms of pollution...;
- Ensure that all local communities both urban and rural have sufficient good quality housing for their needs...;
- Promote access to employment, shopping, education, health, community, leisure and sports facilities and open and green space, maximising opportunities for community development and social welfare;
- Foster improvements to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity. In general, developments likely to support the achievement of an integrated transport system should be encouraged;
- Foster social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides;
- Promote quality, lasting, environmentally-sound and flexible employment opportunities;
- Support initiative and innovation and avoid placing unnecessary burdens on enterprises (especially small and medium sized firms) so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness:
- Respect and encourage diversity in the local economy;
- Promote a greener economy and social enterprises;
- Contribute to the protection and, where possible, the improvement of people's health and well-being as a core component of sustainable development and responding to climate change...."
- 2.3 Section 4.6 of PPW examines the sustainable settlement strategy for locating new developments. Paragraph 4.6.2 states:

"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. In their land allocation policies and proposals, local planning authorities should:

- 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 (including for energy supply, waste management and water);
- ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location;
- locate development in settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, ensure that the development is designed for resilience over its whole lifetime:
- ensure that tackling the causes and consequences of climate change is taken into account in locating new development."
- 2.4 The principles of this strategy were adopted when the Sustainability Appraisal of proposed development sites were considered at the Scoping Stage of the LDP. These are identified in the Vale of Glamorgan Sustainability Appraisal Report (November 2011). The objectives identified in paragraph 0.20 of the report are:
- To provide the opportunity for people to meet their housing needs.
- To maintain, promote and enhance the range of local facilities.
- To maintain and improve access for all.
- Reduce the causes of deprivation.
- To maintain, protect and enhance community spirit.
- To minimise the causes and manage the effects of climate change.
- To minimise waste.
- To use land effectively and efficiently.
- To protect and enhance the built and natural environment.
- To provide a high quality environment within all new developments.
- To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage.

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- To reduce the need to travel and enable the use of more sustainable modes of transport.
- To provide for a diverse range of local job opportunities.
- To maintain and enhance the vitality and viability of the Vale's town, district and local centres.
- 2.5 The purpose of a Local Development Plan is to guide future development and land use throughout the Plan period. At the heart of this is the Council's vision, presented through the Strategy of the Plan. This Strategy identifies St Athan as:
- "a Strategic Opportunity Area, with a focus on investment in and around the land holdings of the Welsh Government and the Ministry of Defence."
- 2.6 The airbase at St Athan (RAF St Athan) was first opened in 1938 and was used for training ground and air crew during WWII with over 14,000 personnel stationed there during the war. After the war it was an important maintenance and servicing base for RAF fighter and bomber aircraft.
- 2.7 In subsequent years a series of defence budget cuts and streamlining resulted in job losses from the site. In 2006 the unit was renamed MOD St Athan and the Special Forces Support Group was formed and located on the site alongside the large aircraft maintenance unit and part of the Defence Training Establishment.
- 2.8 In 2007 it was announced by the Government that MOD St Athan would be the site of a new Defence Training Academy (DTA) which would involve all British Military recruits attending to undertake specialist phases of their training courses on the site. The project would have involved a £14 billion investment in the site and was anticipated to require approximately 300ha of land, the majority already within the existing boundary of MOD St Athan.
- 2.9 This development would inevitably have led to an increase in demand for employment and dwellings off the site.
- 2.10 However, further defence cuts resulted in the contract being cancelled. Nevertheless, it is still anticipated that the Special Forces Support Group will be expanded, resulting in significant investment on the site.
- 2.11 The Deposit LDP acknowledges the loss of the anticipated £14 billion investment but nevertheless, St Åthan remains a Strategic Opportunity Area in the Wales Spatial Plan. St Athan was also designated as an Enterprise Zone in September 2011.
- 2.12 The Vale of Glamorgan Sustainable Settlements Appraisal 2007 states that the village of St Athan has an estimated population of some 1,300, based upon 2.5 persons per household. It has good road access from the B4265 and potential for a rail and public transport improvements at relatively low cost to facilitate investment in the area.
- 2.13 The St Athan Settlement Boundary identified in the Proposals Map (February 2012) for the Vale of Glamorgan Local Development Plan 2011-2021 is shown in Figure 2 below with the subject site extending to 8.47 hectares (20.93 acres) identified in blue.
- Justification for Site Inclusion in the LDP

Agricultural Operations

- 3.1 RAC undertook a site visit to Church Farm and the candidate site. The land is currently in long-term pasture which is grazed by cattle and sheep.
- 3.2 Church Farm is a 56.6ha (140 acre) farm comprising some 46ha of grassland and 10ha of cereals. All of the land is located within close proximity to the candidate site. The holding is farmed by Mr Carl Brewer, who owns the farm in partnership with his mother.
- Figure 3. The candidate site, adjoining the B4265 and Gileston Road.
- 3.3 Livestock on the holding comprise 20 suckler cows and some 70 beef cattle of assorted ages and 110 ewes producing approximately 150 lambs per annum. The farm is small by local standards and not capable of providing a full-time income and therefore Mr Brewer works full-time for a local agricultural machinery dealer.
- 3.4 The holding has the benefit of one modern steel portal-framed farm building (32m x 13.8m) plus a number of small storage buildings. Mr Brewer lives on-site in a modern farmhouse adjacent to the farm buildings. The farmstead is located to the immediate north of the candidate site, alongside Rock Road and adjacent to St Athan Primary School (infants and juniors).
- 3.5 The fact that the farmstead lies within the settlement boundary makes it difficult to intensify the agricultural operations due to the potential for noise and odour nuisance from animals and agricultural machinery. This fact also limits the working hours of the business with a consequent limit on the amount of work which the farmer is able to undertake during a day. Within 50m of the farm buildings there are a

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Representor ID and details: 4869/DP1 Messrs C & V Brewer

number of sensitive receptors:

- · St Athan Primary School;
- The Four Bells Inn public house;
- Some 30 private dwellings; and
- · A car repair garage.
- 3.6 The fact that the farm buildings are located adjacent to the primary school is also material due to the potential (or perhaps the perceived potential) for the spread of infectious agents to children.

Village Facilities and Services

- 3.7 The village of St Athan comprises some 1,300 people and has the benefit of amenities beyond those expected for comparable sized settlements. Shopping facilities and services comprise:
- two general/convenience stores;
- a post office;

pharmacy;

- · church;
- florist:
- Chinese take-away;
- two public houses;
- a health centre;
- library;
- three hairdressers; and
- three community halls.

Further facilities such as banking and secondary education are available in Llantwit Major, 2 miles distant.

Figure 3. The candidate site, adjoining the B4265 and Gileston Road.

- 3.8 It is understood that the primary school, with a school roll of some 210 pupils, is currently undersubscribed with a result that four classrooms are empty. It is anticipated that a Section 106 agreement will require a contribution from any developer of the land towards education facilities. Clearly, extra houses will result in a larger number of pupils attending the school which, given the spare capacity, will lead to a more fulfilled educational experience, especially with extra contributions from the developer of the site.
- 3.9 It is also understood that some of the village amenities are underused, threatening their long-term viability. A larger village population, all within walking distance of the facilities, will inevitably result in a more prosperous and vibrant trading environment.
- 3.10 The development proposal on the site is expected to provide some 250 dwellings, of which 30% are required to meet the need for affordable housing.
- 3.11 The sustainability of the village is enhanced by its central location within the Vale and the proximity of good public transport connections. A total of 12 bus and coach services serve the village with bus stops at the southern end on the B4265 junction with Gileston Road; the village centre on Rectory Road; and on Cowbridge Road at the northern end of the village.
- 3.12 The nearest railway station is in Llantwit Major, although the Vale of Glamorgan Line passes immediately south of St Athan. The St Athan railway station closed in the 1950s, but with the prospects of an increase in employment and inhabitants there is potential for the station to re-open in the future.
- 3.13 MOD St Athan is a major influence upon the community in terms of income and employment. Whilst there are many services on the base for MOD personnel such as shops, sports facilities and a cinema, reliance is also made on local amenities in St Athan, Llantwit Major and larger local towns such as Barry and Bridgend.
- 3.14 The Vale of Glamorgan Sustainable Settlements Appraisal 2007 scored each settlement within the Vale. St Athan was the joint fourth settlement based upon available services and facilities. In order for a development to be sustainable it is important that it has good accessibility to services and facilities. Ideally employment opportunities should be in close proximity. These factors would minimise the need to travel with a private vehicle.
- 3.15 St Athan is classified as a primary settlement because of its strategic position within the Vale of Glamorgan, combined with the level of existing services and facilities within the village. Accessibility from the

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highway network is very good and is likely to be enhanced under the LDP for employment purposes.

3.16 The fact that St Athan, and the Church Farm site in particular, are so close to an important highway in the Vale (B4265) means that public transport is highly accessible. This would be improved further still if the railway station was reinstated, as the station would be within easy walking distance of any new development at Church Farm.

Sustainability

- 3.17 It is evident that the field is well situated in terms of accessibility and proximity to the services provided within the village.
- 3.18 St Athan has a good range of services (some of which are underutilised) and employment prospects, with a consequence that there is considerable potential to reduce the number of car journeys. Thus, the sustainability weighting for the village results in a high score. In the case of St Athan this is even more important because it is understood that extra business is required to maintain the provision of services.
- 3.19 Based on these facts RAC considers that the Church Farm site should be scored higher than 35 in Appendix 3 of the Sustainable Settlements Appraisal 2007. Under such circumstances it would be ranked alongside Barry, Penarth and Rhoose. Furthermore, the proposal would match housing with employment opportunities which are likely to be generated by MOD St Athan, in spite of the loss of the Defence Training Academy option. It is understood that other employment creation opportunities are to materialise. The availability of good quality housing will improve the prospect of new businesses setting up in St Athan.
- 3.20 One of the main drawbacks of the Church Farm site identified in the sustainability appraisals of the options presented for inclusion in the LDP was the fact that the site is a greenfield site. It is Government policy that, where possible, development should be avoided on the best and most versatile agricultural land Grades 1 to 3a.
- 3.21 Whilst a detailed assessment of the soil has not yet been undertaken by RAC, available information from an interpretation of soil maps indicates that the site is likely to be classified as Sub grade 3b. This land is not amongst the best and most versatile land to which policy affords a degree of protection. The land has been in pasture for many years and visits to the site have shown a significant amount of poaching (cutting up of pasture in wet conditions) by cattle, which indicate a lack of versatility of the land in terms of arable use. Therefore, the loss of the parcel of land to development would not be severely detrimental to agricultural production.
- Figure 4. The candidate site, showing poaching of pasture by cattle and the relict hedgerow. Aberthaw Power Station is in the distance.
- 3.22 It is clear that the construction of 250 dwellings on the field will have a visual impact. However, this could be partially mitigated through landscaping. Nevertheless, since the site is flat and not overlooked from higher land in close proximity, the visual impact is not as great as a more undulating site would experience.
- 3.23 Appendix 12 of the Deposit LDP Sustainability Appraisal Report considers 'MG4 Strategic Site at St Athan Strategic Opportunity Area' (7 November 2011) in pages 1187 1203. The appraisal covers all sites within the Strategic Opportunity Area at St Athan, which extend to 170ha of employment land and 450 dwellings. The Church Farm site, by comparison, comprises 8.47ha of proposed residential land resulting in 250 dwellings.
- 3.24 The report states:
- "The assessment realises high numbers of negative effects, with 30 double negative effects based largely on sustainable transport, protection of the natural environment and climate change factors, and 51 negative effects across a wide range of factors. The high level of negative effects are a result of a high level of development being located in and around a small scale settlement that is not served by high levels of public transport and the consequential use of a significant amount of greenfield land. The reasoned justification identifies that the sites will be constrained by local biodiversity and heritage issues but these can be mitigated so as not to preclude development and the assessment consequently realises negative effect for heritage and biodiversity issues."
- 3.25 It must be emphasised that the Church Farm site will not experience such high levels of negative effects as the whole Strategic Opportunity Area, largely due to its proximity to the public transport network alongside the B 4265 and through the village of St Athan. It is also anticipated that the provision of extra dwellings will result in extra public transport services, notably buses, being provided.
- 3.26 It is also predicted that the inevitable increase in traffic from the development at Church Farm will not create a proportionate increase in traffic travelling through the village of St Athan because the majority of domestic vehicles will access the residential housing from the B4265 and not have to enter or pass through the existing village.
- 3.27 RAC considers that the assessed negative effect on climate change is misleading because employment prospects are in very close proximity to the Church Farm site. The consequence is that there will be a much reduced requirement for motorised travel for employees.
- 3.28 Furthermore, it is now commonplace for Local Planning Authorities in Wales to condition building permission that all dwellings meet BREEM standards and achieve a minimum code for Sustainable Homes Level 3 and achieve a minimum of 1 credit under category 'Ene1 Dwelling Emission Rate' in accordance with the requirements of Code for Sustainable Homes: Technical Guide November 2010.

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Representor ID and details: 4869/DP1 Messrs C & V Brewer

Biodiversity

- 3.29 In addition, it is anticipated that the loss of the land at Church Farm will not have the same level of negative impact as the remainder of the Strategic Site because, as identified in Figure 4, the field has experienced significant poaching over a prolonged period of time and the hedgerow has been severely damaged by livestock, thereby removing potential habitats for nesting birds and other forms of wildlife. However, it is noted that "the assessment identified positive effects for the efficient and effective use of land."
- 3.30 Given the current condition of the Church Farm land, there is potential to improve biodiversity. Furthermore, there is likely to be a planning gain from the removal of farm buildings and open agricultural storage from the northernmost part of the site which is in close proximity to the infants and junior schools and many dwellings within the village. This could potentially be replaced by a parking area for the school as it is noted that parking on Rock Road by parents dropping off and collecting children from school creates considerable congestion and danger for both children and road users.

Planning Gain

- 3.31 The field and the farm is constrained on a number of points for efficient agricultural management and fieldwork, largely because the farmstead is in such close proximity to many dwellings and services in the village, inhibiting standard agricultural practices undertaken on a more open site. In addition, Rock Road is a one-way street with the consequence that all farm traffic must pass directly through the centre of the village through residential areas.
- 3.32 The removal of the farmyard from its current location would improve the quality of life for many St Athan residents.

Figure 5. The proposed development site; farm buildings to the left and school to the right

- 4. Conclusions
- 4.1 As part of the preparation of the Vale of Glamorgan Local Development Plan, the Council has assessed all potential sites within the Authority's boundaries and concluded in the Draft Preferred Strategy that St Athan offers opportunity for a realistic and sustainable approach to future development.
- 4.2 This has also been recognised by the Welsh Government in identifying St Athan as one of only three Strategic Opportunity Areas within South East Wales. In addition it has been designated as an Enterprise Zone.
- 4.3 The potential for employment opportunities relating to the adjacent MOD St Athan are considered realistic and the provision of housing within close proximity to the site will provide a more self-reliant local economy with reduced travel requirements.
- 4.4 The Church Farm site of some 8.5ha is already surrounded on two sides by residential housing in St Athan plus a primary school. Highway connections are supplied by the B4265 located to the southern side of the site.
- 4.5 The field has low agricultural productivity with low levels of biodiversity and development of the site would entail the removal of agricultural buildings from the close proximity of residential housing and the school.
- 4.6 There are already many facilities within the village which are under-utilised, including the school, and extra dwellings would improve the use and viability of these facilities.
- 4.7 Potential adverse impacts of the development could be mitigated through conditioning of any permission to provide 250 environmentally sustainable dwellings which will reduce the carbon footprint of the inhabitants significantly.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4870/DP1 Paul Denzil Morg	gan						
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	e Additional SA SEA		Rep format: Eform	•	•	to be consiered by 'writter ession of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		and does not not me P2 - No	et one or more test(s)	of soundness, ple	ease indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
	Coherence and Effect	tiveness Tests - C	E1 - No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Parag</u>	raph Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(19)			MG2			
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your rep	oresentation? Yes	; ((If "No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plar	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragr	raph: New Or An	nended Site: Other (see	Notes):
	No	Yes	No	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amend	ed site, did you submit Site Name:	the site as a Candic	late Site? No	(If "Yes", pl	-	ndidate Site Name and re Reference:	ference if known)
2a Diago act out your representation below							

3e - Please set out your representation below:

Representation on Proposals Effecting Dinas Powys (Ref MG2 (19))

This representation is from Paul and Denise Morgan of 15 Windyridge, Dinas Powys. The proposed new housing developments illustrated in the Local development Plan shows a radical change for the inhabitants of Dinas Powys. 340 new houses are to be built on the old St. Cyres school and 60 new houses are to be built on Caeleon Road. This off course does not include the thousands of new houses built in Barry, Lavernock and Sully.

An increase in housing means an increase in the population and the services they require. The medical centre on Cardiff Road is already at full capacity and is in dire need of a replacement building. Likewise the Infants and Junior school are unable to take any more children. It is probably fair to say that crime will rise as well due to the increase in youngsters with nothing to do and nowhere to go. A properly run youth centre would be ideal to counter the development of anti-social behaviour.

Currently ten thousand cars per day travel through Dinas Powys. Already two thousand new homes have been approved for Barry, adding a further three to four thousand cars per day. By building yet more houses in Dinas Powys, the Vale of Glamorgan council plan to add an a further one thousand cars to the already gridlocked and dangerously overcrowded Cardiff Road.

The only way to reach the Cardiff Road is via the Hebron Hall junction or over the railway bridge. As you may be aware, traffic tailbacks trying to access Cardiff Road are already extensive and are almost permanent throughout the day.

All these cars pass by the Infants School teaching young children between the age of three and seven. These young children are already subjected to the noxious fumes of ten thousand cars, with the unknown risk of serious health problems. Adding yet more cars will only add to that risk.

The local development plan (MG 2 [19]) suggests a secondary access to the proposed housing development on the old St. Cyres Comprehensive site as being though Windyridge. The access to Windyridge is steep and convoluted and can be particularly dangerous in the winter. The road is only just able to handle the current traffic load, belonging to the residence of Windyridge, but will be unable to to handle the hundreds of new cars belonging to the residence of the proposed development. The quantum increase in traffic can only lead to congestion and numerous accidents.

The old St. Cyres comprehensive school site can be used for many things apart from housing. A new medical centre is desperately needed as well as a sports and social centre for youngsters. On purely health grounds, the children from the infants school could be moved straight into the old St. Cyres school and into a cleaner a more beneficial environment.

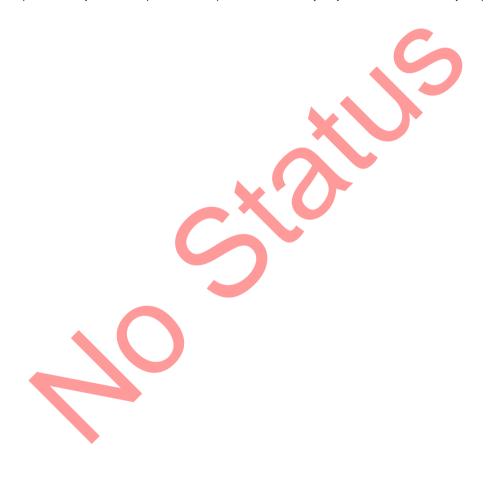
It appears that the Local development Plan for Dinas Powys has been conceived purely to meet the targets set by the Wesh Office and bears no regard for the social and environmental requirements of the people of Dinas Powys. This six week consultation period has also been set up in such a way that it makes it extremely difficult for ordinary people to comment on the proposals. There are thousands of pages of

(ordered by Representation ID No.)

Representor ID and details: 4870/DP1 Paul Denzil Morgan

documents to read through, none of which are meant for a lay person to understand. The Vale of Glamorgan has made no effort to involve the people who these proposals will effect and as such we strongly recommend that you do not allow these plans to progress any further

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



(ordered by Representation ID No.)

Representor ID and details: 4871/DP1 Prof. Yaw A. Deb	rah						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Email	, ,	ur comments to be consiered a hearing session of Publ	ed by 'written representation: lic examination?	s' or do
2a - Do you consider the LDP is Sound? Unanswered	•		loes not not meet or P2 - Unanswe	` ,	oundness, please indicate	which test(s) that it fails.	
	Consistency Tests -	C1 - Unanswered	C2 - Unanswe	ered C3 - Unansw	vered C4 - Unanswere	ed	
	Coherence and Effecti	veness Tests - CE1 -	Unanswered Cl	E2 - Unanswered	CE3 - Unanswered CE	4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)	Paragraph		roposal Map:	<u>Constrai</u>	nts Map Appendices	<u>:</u>
Bb - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	resentation? Unanswe	ered (If "N	No" or "Unanswered" -	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered Notes:		New Paragraph: Jnanswered	Amended Paragraph Unanswered	New Or Amended Site: Unanswered	Other (see Notes): Unanswered	
3d - If your representation relates to a new, deleted or amend	ed site, did you submit t Site Name:	he site as a Candidate S	Site? Unanswered	(If "Yes", please	e give the Candidate Site N Site Reference:	lame and reference if known	ı)

3e - Please set out your representation below:

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

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

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

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

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

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

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

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

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

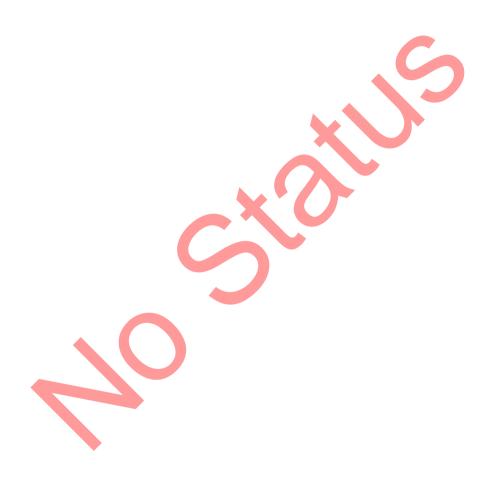
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4871/DP1 Prof. Yaw A. Debrah

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

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



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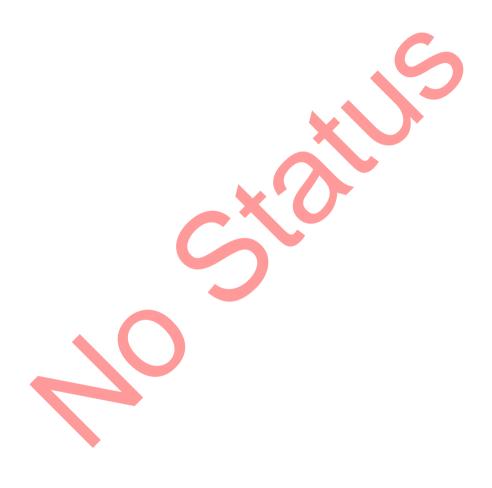
Representor ID and details: 4872/DP1 Mr H Gaylard							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □			Rep format: Eform	•		be consiered by 'written sion of Public examinati	n representations' or do on? Examination
		he Plan is unsound and	I does not not mee	et one or more test(s)	of soundness, plea	se indicate which test(s) that it fails.
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	Coherence and Effec	tiveness Tests - CE1	- No	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:		h Number:	Proposal Map:		Constraints Map	Appendices:
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	Notes:						
3d - If your representation relates to a new, deleted or amende 3e - Please set out your representation below: Area referred to in my comments is the local development In preparing the local plan for Dinas Powys I believe that t St Cyres School Annex proposals. No account of the envi 1. The traffic impact on Murch Rd/ Murch Cresent and the 2. The environmental impact on current houses together w 3. Surface and foul water drainage is at maxumum capaci 4. Trees around the edge of St Cyres school field require	Site Name: plan for Dinas Powys he following points ha romental impact of this juntion with Cardiff Re vith the amount of car- ty and presently over	ve not been taken into a s development has bee d s parked on both sides lows during heavy rainfo	account and not en n seriously conside of Murch Rd / Mur all.	nough detail and examerd and I raise the folloch Cresent curently re	Site Re Site Re Site Re Site Re Site Re	to one lane.	cal area considered.
any local plan.			•		•	inio, tino nocao to be dic	oddoodd arid patriig iilio
Consultation is needed to assess the impact the increase	in population and hou	ses would have on the	community and fa	cilities required for the	em.		
 The doctors surgery is currently too small for the needs The impact the increase of pupils will have on the existi More leisure, sport and transport facilities required. 	of the existing popularing junior schools - mo	ation and compared to core places will be require	other modern surge ed.	eries the village is lack	king in services tha	t they are available to p	orovide.
3f - Please outline the changes you wish to see made to the Doubline of changes to be put forward:-	eposit Plan to make it	sound (if relevant)					
1. When the Dinas Powys school is vacated the Nursery a	and primary schools co	ould be relocated to this	Annex. The DP (Church School could a	also be located in th	ne same area.	
2. This would free up 3 sites that are centrally located to b for a new Doctors Surgery. Facilities that are desparately							

3. A new junction is required at the Merrie Harriers to open up the Hospital Access and provide access to new houses that could be built on the fields between D P and Llandough along side the new bus lane.

(ordered by Representation ID No.)

Representor ID and details: 4872/DP1 Mr H Gaylard

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing How the proposed development of the St Cyres Dinas Powys Annex site will effect the houses and traffic in the immediate vicinity. Also concerned that proper facilities will be provided to establish a healthy and balanced community.



(ordered by Representation ID No.)

Representor ID and details: 4873/DP1 Mrs Sonya Jenkin	ns						
Date Lodged Status Petition and No. Supporting Evidence 27/03/2012 M □ 0 □	Additional SA SEA		ep format: omment form	4a - do you want you you want to speak at		consiered by 'written rong of Public examination	
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3c - What changes would like to see made to the Deposit Plan	Unanswered Un		Paragraph: nswered	Amended Paragraph: Unanswered	New Or Amende Unanswered	Other (see No Unanswered	otes):
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3d - If your representation relates to a new, deleted or amende	ed site, did you submit the si Site Name:	te as a Candidate Site?	Unanswered	(If "Yes", please	give the Candida Site Refere	te Site Name and reference:	rence if known)
3e - Please set out your representation below: Policy MG2 (36) allocates for residential development lan	d off Badger's Brook Rise, Y	stra <mark>do</mark> wen, which is own	ned by our clier	nt, Mrs Sonya Jenkins.	Mrs Jenkins weld	comes and supports th	e allocation.
The site is not subject to environmental constraints: It is not located in a flood risk zone. It does not lie within an area that is designated for its env There is no evidence of archaeological interest (see repo The land is not "best and most versatile" agricultural land	t submitted under separate						
Development of the site would round-off the built form of established hedgerow to the north (alongside Sandy Lane	Ystradowen in this location to e) and east.	o a <mark>st</mark> rong boundary con	mprising existing	g development at Badg	ers Brook to the w	west, existing residentia	al properties and an
Although the LDP refers to the possibility of access being there has been laid out to facilitate access, and rights exist	taken from Sandy Lane - are tin favour of our client. She	nd this is not disputed - t e also enjoys rights to co	there is an alter onnect to existir	rnative or additional acc	cess available fron ity.	n Badger's Brook Rise	. The development
The site is unconstrained, suitable for development and c want to live. Although Ystradowen is a rural settlement, in							
3f - Please outline the changes you wish to see made to the D N/A	*						
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to spe	eak to the inspector abou	ut and why they	consider it be necessa	ary to speak at the	hearing -	

Representor ID and details: 4873/DP2 Mrs Sonya Jenkin	3		
Date Lodged Status Petition and No. Supporting Evidence 27/03/2012 M 0		Rep format: 4a - do you want your comments to Comment form you want to speak at a hearing sess	
		pes not not meet one or more test(s) of soundness, pleas P2 - Unanswered	
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered C4 -	Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Inanswered CE2 - Unanswered CE3 - Unanswe	red CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	lumber: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?		ew Paragraph: Amended Paragraph: New Or Amer nanswered Yes Unanswered	nded Site: Other (see Notes): Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Sit Site Name:		idate Site Name and reference if known) ference:
3e - Please set out your representation below:			
Section 8 of the Deposit Written Statement (at pages 149- under Policy MG2(36). On behalf of the owner of that land			, which is allocated for residential development
Archaeology The document recommends that, based on the advice recommissioned a desk-based assessment of the archaeology. Assessment, Cotswold Archaeology, March 2012) is enclosed.	gy and cultural heritage of this site, which includ	ded a site visit by an experienced archaeologist. A copy	of the report (Heritage Desk Based
Phasing The Council has phased the development of the site for th protected through adjoining development. The site is capa		ed in separate representations, the site is unconstrained	and rights of access and services have been
3f - Please outline the changes you wish to see made to the De Archaeology	posit Plan to make it sound (if relevant)		
It is requested that the reference to a requirement for an a	rchaeological evaluation of this site be deleted, a	as it is not warranted.	
Phasing It is requested that the development of the site be rephras	ed to 2011-16 or 2016-21.		
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector a	bout and why they consider it be necessary to speak at	the hearing -

Representor I	D and d	etails:	4874/D	P1 VJ Thomas & Soi	า						
Date Lodged 30/03/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Comment forr		your comments to be at a hearing session		en representations' or do tion? Examination
2a - Do you co	nsider th	ne LDP	s Sound?	Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound an P1 - Unanswered		et one or more test(s) o swered	f soundness, please i	ndicate which test(s	s) that it fails.
					Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 - Ye	s	
					Coherence and Effec	tiveness Tests - CE	1 - Unanswered	CE2 - Yes	CE3 - Unanswered	CE4 - Yes	
3a - Which par	t of the I	Deposit	Plan are y	ou commenting on?	Policy Number:	<u>Paragra</u>	oh Number:	Proposal Map:		Constraints Map	Appendices:
					89. 74	5.4. 5.1	4				
3b - Do you wi	sh to see	e any ch	anges ma	de to the Deposit Plan	as a result of your rep	presentation? Yes	(1	f "No" or "Unanswered	l" - go to 3d)		
3c - What char	nges wo	uld like	o see mad	de to the Deposit Plan	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amende Yes	ed Site: Other (see Unanswere	
					Notes:						
3d - If your rep	presenta	tion rela	ates to a ne	ew, deleted or amende		the site as a Candidat the West of Swanbridg		ered (If "Yes", plea	ase give the Candida Site Refere		eference if known)
3e - Please se Our repre	•			pelow: n attached pdf docume	nt.			,			
		•	•		eposit Plan to make it dge Road, Sully to be	,	as a housing expa	insion area and mainta	ined as an area for a	gricultural use.	
I would lil	ke to spe	eak to th	e Inspecto	or about the lack of su	· ·	or housing purposes a	· · · · · · · · · · · · · · · · · · ·	hey consider it be nece levelopment would hav		-	es which use the fields.

(ordered by Representation ID No.)

Representor ID and details: 4875/DP1 Mrs C A Miskin						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA	<u>Rep format:</u> Eform	,		e consiered by 'written re on of Public examination'	•
•	2b - If you think that the Plan is unso Procedural Tests - P1 - No	P2 - No	one or more test(s) of	soundness, please		at it fails.
	Consistency Tests - C1 - No Coherence and Effectiveness Tests -			CE3 - No	CE4 - No	
, , ,		- -	Proposal Map: SP7(1))	Constraints Map Ancient and Semi Natural Woodland	Appendices: Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation?	Yes	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Po No No Notes:	olicy: New Paragraph: No	Amended Paragrap	h: <u>New Or Ameno</u> Yes	led Site: Other (see Not No	<u>es):</u>
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Ca Site Name: Model Farm, Port Road,		(If "Yes", pleas	J	ate Site Name and reference: 2501/CS.1	ence if known)

3e - Please set out your representation below:

My comments about the rail spur also apply to Policies SP2(3), MG13 and MG20(5).

I live in Llantwit major and work in Cardiff. The current train service frequency from Llantwit needs improving to enable far more commuters to use the train for work. I do not use it as the timetable does not fit my working hours, so like many others drive daily into Cardiff. The proposal would prevent any improvement to the frequency of trains from Llantwit or Rhoose as the line would be full to capacity with the proposed airport spur timetable.

The current Saturday 1 hourly and Sunday 2 hourly service from Llantwit is also inadequate. If frequency was increased more people would be able to use the train. Many of us work / shop on Saturdays and would like to use the train but are deterred or prevented from doing so due to the lack of frequent trains. For those who shop / work on Sundays the present service frequency is extremely poor.

The proposal threatens the viability of the existing train service from Llantwit and Rhoose especially during "off Peak" hours. It threatens the existing shuttle service from Rhoose to the airport so those of us travelling from Llantwit to the airport would probably have to travel into Cardiff and back out in order to reach the airport by train - a ridiculous position.

The Llantwit / Rhoose to Cardiff journey time could be quicker if the stops between Barry and Cardiff were reduced, as the current service from Llantwit is slower than driving to Cardiff.

The current rail / bus link to the airport works well, the problem is that it is infrequent - only one train per hour from the airport to Cardiff. If there were more trains from Llantwit and Rhoose into Cardiff and a more frequent bus shuttle from the airport to Rhoose station, the link for air passengers would work far better. If there is capacity to increase trains to an additional 4 trains per hour in order to serve a direct airport link as proposed in the plan, the capacity should be used to improve the frequency of trains to Llantwit and Rhoose providing 4 / 5 trains per hour instead and a far more frequent service for those of us living in Llantwit and Rhoose areas as well as for airport travel.

I have teenagers who like to travel into Cardiff / Bridgend after school / at weekends - the frequency of service prevents this especially on Sundays, isolating them from activities which are available to other teenagers who have better public travel facilities.

The environmental impact of the proposal is substantial, the Vale is an area which is known for agriculture and countryside and this brings tourists to the Vale. The proposal will have a negative affect on Tourism in the Vale and cause significant environmental damage.

The cost of the proposal is a gross misuse of public funds. Even if developers were to fund the capital cost, the ongoing upkeep costs would fall to the Vale tax payers to fund and yet be of no real benefit to

(ordered by Representation ID No.)

Representor ID and details: 4875/DP1 Mrs C A Miskin

them.

Any available capital could be better spent improving the existing service with increased trains and shuttle busses, along with improvements to Rhoose, Bridgend and Cardiff stations to make luggage transportation for airport travellers less of a problem. Transporting suitcases, for travellers, particularly for elderly disabled or families travelling to the airport by train has to be easy and current arrangements do nothing to assist these groups.

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

My comments about the rail spur also apply to Policies SP2(3), MG13 and MG20(5). Please refer to my comments above, in addition:

In terms of the operation of the Airport there is not a strong case for the proposal in economic terms, as passengers using rail links to access the Airport are very much in a minority. On the face of it the link would be economically unviable, and on its own would do little to boost usage of the Airport. Indeed a recently published report concluded that it is the destinations/routes offered that are the main determinants of Airport usage.

Further, at a more practical level there are capacity problems with attempting to target a provision of four trains per hour to the Airport, as this may potentially clash/interfere with further improvements to services on the Vale of Glamorgan line which is already constrained by the freight trains which service Aberthaw Power Station.

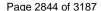
The route does not follow the contours, and as such would necessitate making substantial cuttings, two tunnels (one under Port Road and one under the Airport terminal road) and then building a bridge 340m long and approximately 23m high at its highest point where it crosses the existing Whitelands Brook. Clearly, such provision is a major engineering work and would be extremely expensive to construct but it is not a proposal contained within any national or regional transport plan. The works would obviously have an adverse visual impact on this rural and coastal location, and given its elevated nature it would be extremely difficult to mitigate its effect. Such impact is all the more concerning as the immediately adjacent area is identified as an extension to Porthkerry Country Park.

There appears to be no supporting evidence referred to in the Vale of Glamorgan council's Supporting Documents to explain on what basis the alignment of the proposed rail link was selected.

In addition, the construction and operation of the railway would be at the expense of a large carbon footprint.

The route proposed would have an adverse visual impact on this rural area which is currently identified in the Council's own Unitary Development Plan as a 'Green Wedge'.

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



Representor ID and details: 4876/DP1 JR Davies & Part	ners						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form		our comments to be of at a hearing session	•	representations' or do n? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	Plan is unsound and P1 - Unanswered	does not not meet P2 - Unans		soundness, please in	dicate which test(s)	that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 - Yes		
	Coherence and Effective	eness Tests - CE1 -	Unanswered	CE2 - Yes	CE3 - Unanswered	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:	<u>C</u>	onstraints Map	Appendices:
	89. 74	5.4. 5.14.					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Yes	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'			New Paragraph: Unanswered	Amended Paragram Unanswered	h: New Or Amended Yes	Site: Other (see N Unanswered	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name: Land to the			red (If "Yes", plea	ase give the Candidate Site Referer		erence if known)
3e - Please set out your representation below: Our representation is included in an attached pdf docume	nt.						
3f - Please outline the changes you wish to see made to the D We would like the agricultural land to the west of Swanbri	•	,	s a housing expar	nsion area and maintai	ned as an area for ag	ricultural use.	
4b - If you wish to speak, please confirm which part of your rep I would like to speak to the Inspector about the lack of sur The draft policy has not fully consigned all the impacts of	stainability of the site for	housing purposes and	-	-		-	which use the fields.

(ordered by Representation ID No.)

Representor ID and details: 4877/DP1 Mrs Maria Pilcher							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	, ,	your comments to be cons at a hearing session of F	•	•
•	•	e Plan is unsound and P1 - Unanswered	does not not meet o	` '	f soundness, please indica	ate which test(s) th	at it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unanswe	ered C3 - Unans	swered C4 - Unansv	vered	
	Coherence and Effective	veness Tests - CE1	- Unanswered C	E2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered	j
, , ,	Policy Number: MG2(16)	<u>Paragraph</u>		roposal Map:	<u>Cons</u>	traints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	resentation? Unansv	vered (If "I	No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragram Unanswered	ph: New Or Amended Sit Unanswered	te: Other (see Note Unanswered	<u>∍s):</u>
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit the Site Name:	he site as a Candidate	Site? Unanswered	(If "Yes", plea	ase give the Candidate Si Site Reference:		nce if known)
2a. Places set out your representation below							

3e - Please set out your representation below:

Any new building of houses on such a large scale is short-sighted at the very least, for the following reasons:

- 1) Infrastructure does not support any further development beyond already over-developed area. Traffic is already a huge problem, throughout Penarth and exiting the town, in all directions. The geography of the area cannot support further traffic.
- 2) It will have a knock-on affect with regard to schools, G.P surgeries, dental requirements etc. There is a waiting list for the schools. Stanwell which is the nearest to the Cosmeston area has a very large waiting list. G.P Surgeries are full.
- 3) Last but not least- environmental impact which appears not to have been considered fully.

(attached letter below)

Re. Proposed LD.P. to Build Houses at Cosmeston, Lavernock Rd., Penarth.

Having contacted your office regarding the above proposal, I was given a number of choices about how to obtain the necessary form, in order to air my views, on the Local Development Plan. One of these was through the local library, which I did. However, apart from where I have written on the form, you must excuse my ignorance, as the rest means very little to me, as to what information is required.

Although I live at the other end of Penarth, to where some 240 houses are proposed to be built, this proposal will still effect me and every other Penarthian. About five years ago, a major development of houses was established at the 'Cogan Hall' area of Penarth. The only traffic consideration was to erect traffic lights on the main road feeding the new housing estate. Nothing could be done to avoid the inevitable build-up of traffic, on that road and more so on the roads exiting Penarth. At the moment, at certain times of the day, it can take me about 15 minutes to go from my house, on to that main road and join a queue. My house is about 30 yards from the main road and about a mile from the above mentioned housing estate. No longer can I estimate the time of a journey, as more often than not, I have been stuck an my car for about half an hour, trying to get out of Penarth. This is only going to become worse, if the houses for the lower end of Penarth, at Cosmeston, are built. Most homes today, have at least two people with cars and so we are looking at approximately 480 extra cars, all using an already very badly congested road. The only other main road out of Penarth, towards Cardiff is also in a similar situation, having to deal with the added 'Penarth Marina' traffic.

Going westward towards Sully and Barry, while it is nowhere near the above given situation, there is always congestion through Sully village, in the mornings and late afternoons. Should any of the traffic from the proposed building of houses journey that way, there will be grid-lock in that direction, too. However, even if finances are not constrained, with regard to road improvements, usually a by-pass is built. The geography of Penarth is such, that even this would not be possible.

(ordered by Representation ID No.)

Representor ID and details: 4877/DP1 Mrs Maria Pilcher

My other main concern regarding the proposed building of these houses, is the environmental effect that this will have. The natural habitats, not only provide beautiful surrounds but are also part of our ecosystem. This area is one of the worst areas in the country, for asthma. I suspect that traffic is largely to blame for this, but with the natural wild life being driven from our immediate surrounds, there will inevitably be a worsening of people's health problems. Again, with so many houses choking that particular area, consideration would have to be given to medical, dental and educational needs. Where would the monies come from, to support these needs? As the present schools and surgeries are presently full and have long waiting lists, how would these needs be addressed? The new building for St. Cyres Community School, will envelop Erw'r Delyn, Maes y Dyfan and Ashgrove Special Schools as well as the existing lower St. Cyres School from Dinas Powys and the present St. Cyres Comprehensive. These along with the Welsh Medium Primary School and The Catholic Primary School will be exiting onto the one main through road in Penarth. This is creating its own concerns at the moment and the proposed build at the other end of Penarth, is only going to add to the problem. Having spoken to Arup' Civil Engineering, who are involved in the community school being built, they have no answer to resolving a potentially dangerous road situation.

Land that has already been built upon and for whatever reason is lying waste, could surely be used for new houses, before contemplating building beyond these developed boundaries. Laws should be introduced, so that firstly, privately owned houses and derelict land, that have not been occupied for years and have been left to decay, can be sold to those needing homes and sympathetically restored and or rented on.

At a time, when the economy is at the fore-front of everything we do, we should be looking to manage what we have and manage it well, for the future of all concerned. Therefore, I am totally opposed to the proposal to build the houses at Cosmeston, Lavernock Road, and eagerly await a suitable response.

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

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

Representor ID and details: 4878/DP1 John Ellis							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	,		oe consiered by 'writter on of Public examination	n representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	e Plan is unsound and P1 - Yes	d does not not mee P2 - Yes	et one or more test(s) of	soundness, pleas	e indicate which test(s)	that it fails.
	Consistency Tests -	C1 - Yes	C2 - No	C3 - Yes	C4 - \	⁄es	
	Coherence and Effecti	veness Tests - CE1	- No	CE2 - Yes	CE3 - No	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	oh Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	oh: New Or Amen	ded Site: Other (see N	Notes):
	No	Yes	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name:	he site as a Candidate	e Site? Yes	(If "Yes", plea	ase give the Candid Site Refe	date Site Name and reference:	erence if known)
3e - Please set out your representation below:				,			
There has been little or no consideration given to the infra The site is very rural and therefore would involve the occu					ilt up areas of the \	/ale of Glamorgan .	
3f - Please outline the changes you wish to see made to the D In my opinion the site is completly unsuitable for the proper	•	` '	a complete rethink	about the location withi	n the Vale of Glam	organ .	
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to	speak to the inspect	or about and why tl	hey consider it be nece	ssary to speak at th	ne hearing -	

Representor ID and details: 4879/DP1 Gareth Johns							_
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform		at a hearing sess	ion of Public examinati	n representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	he Plan is unsound and P1 - No	P2 - No	et one or more test(s) of	soundness, pleas) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effec	tiveness Tests - CE1	- Yes	CE2 - No	CE3 - Yes		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
	LDP Strategy						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	Policy:		New Paragraph:	Amended Paragra	oh: New Or Amer	nded Site: Other (see I	Notes):
	Notes:	NO	NO	No	NO	140	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name: Land at		Site? Yes	(If "Yes", plea	-	date Site Name and re erence: 2616/cs.1	ference if known)
3e - Please set out your representation below: Site 2616/CS.1 should be removed from the draft LDP for	the following reasons	;					
The local primary school is of insufficient scale to cope wi	th the additional pupil	demand, particularly in r	espect of recepti	on class numbers and r	ursery provision.		
The road infrastructure does not have sufficient capacity to	o cope with additional	traffic, with commuter tr	affic 'bottelneckir	ng' at The Merrie Harrier	at peak times.		
Redlands Road, Cardiff Road and Sully Road are all too be Councils traffic systems.	ousy currently to cope	with the additional traffic	generated. No re	egard has been paid to	the effect of additi	onal traffic flow on the a	adjoining Cardiff City
Additional road traffic generated by this site will have an a	dverse effect on amer	nity and quality of life in	Sully village.				
Construction traffic would be heavy and the access to the	site cannot cope with	this additional traffic, pa	rtcularly in the co	ontext of the unrepaired	roads in the Vale	of Glamorgan currently	
The safety of Sully Road will be compromised by addition The development of this scale proposed in Sully cannot b					vo schools droppii	ng off in the morning an	nd evening on Sully Road.
There should be a presumption for the development of broaders	ownfield land prior to the	he development of 'gree	n wedge'				
3f - Please outline the changes you wish to see made to the D candidate site 2612/CS.1 should be romoved form the LD	•	, ,					
4b - If you wish to speak, please confirm which part of your rep	presentation you wish	to speak to the inspector	r about and why t	they consider it be nece	ssary to speak at	the hearing -	

Representor	ID and	details:	4881/D	P1 Thomas Bruce								
<u>Date Lodged</u> 02/04/2012		Petit	ion and No. 0	Supporting Evidence	Additional SA SEA			Rep format: Eform	•	•	to be consiered by 'writte ession of Public examinati	•
2a - Do you c	onsider t	the LDP	is Sound?	Sound	2b - If you think that the Procedural Tests -	ne Plan is un P1 - No	sound and	does not not me P2 - No	et one or more test(s	s) of soundness, ple	ease indicate which test(s) that it fails.
					Consistency Tests -	C1 - No		C2 - No	C3 - No	C4	- No	
					Coherence and Effect	tiveness Test	ts - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which pa	art of the	Deposi	t Plan are y	ou commenting on?	Policy Number:		Paragrapl	Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you w	ish to se	ee any c	hanges ma	de to the Deposit Plan	as a result of your rep	resentation?	' No		(If "No" or "Unanswe	red" - go to 3d)		
3c - What cha	anges wo	ould like	to see mad	de to the Deposit Plan?	? New Policy: No	Amended No	Policy:	New Paragraph	Amended Para	graph: New Or Am No	nended Site: Other (see No	Notes):
					Notes:							
3d - If your re	epresent	ation re	lates to a ne	ew, deleted or amende	ed site, did you submit s Site Name:	the site as a	Candidate	Site? Unansw	ered (If "Yes",		ndidate Site Name and re Reference:	ference if known)
3e - Please s	set out yo	our repr	esentation b	pelow:								
somethi an emer possible	ng I find rgency a future d s to the L	ludicrou rise at e levelopr	us. Port Roa either Cardif ments in and	ad is basically a two la f Wales Airport or the d around Rhoose, the	ne road, already sited of Dow/Cabot site on the development at the top	on it close to lower part of of Pencoed	Brynhill is Barry the tre Lane, to	Barry Boys Com response time co contemplate ar	prehensive School, a ould be seriously com extra 180 houses br	major Tesco outle promised. Given the inging with them po	al to build houses on the at and most importantly Ba ne extremely high volume ossibly 250+ extra cars m rea of peace and beauty a	arry Fire Station. Should of traffic on the road, akes the proposed
		·	•	n to see made to the D emain in its current for	eposit Plan to make it m.	sound (if rele	evant)					
4b - If you wi	sh to sp	eak, ple	ase confirm	which part of your rep	presentation you wish t	o speak to th	ne inspecto	r about and why	they consider it be no	ecessary to speak	at the hearing -	

Representor ID and details: 4882/DP1 Dr lan Johnson							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Letter	•	your comments to be cons k at a hearing session of P		tations' or do
•	2b - If you think that the Procedural Tests -			` '	of soundness, please indica	ate which test(s) that it fail	ls.
	Consistency Tests -	C1 - Unanswered	C2 - Unans	swered C3 - Unan	swered C4 - Unansw	ered	
	Coherence and Effect	iveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:	Consi	traints Map Apper	ndices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Unans	wered (I	f "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amended Site Unanswered	e: Other (see Notes): Unanswered	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit s	the site as a Candidate	Site? Unanswe	red (If "Yes", ple	ase give the Candidate Sit Site Reference:	e Name and reference if I	known)
3e - Please set out your representation below:							

- - 1. I welcome the opportunity to respond to the LDP proposals for the Vale of Glamorgan County Borough, and include some brief observations on the proposals. I reserve the right to further critique the LDP in future.
 - 2. The methodology used to calculate population increase in the Vale of Glamorgan is unclear. As this is also the basis for determining the amount of housing required in the period being spanned by the LDP, it is difficult to assess whether the amount of housing recommended is appropriate.
 - 3. As a matter of principle, Brownfield sites should be adopted for usage before Greenfield sites are considered for housing development.
 - 4. Where candidate sites are agreed, planning permission for housing should closely reflect housing need in terms of the size of proposed accommodation. Developments should avoid too great a density of housing.
 - 5. The Waterfront area should provide the majority of new housing in Barry but must also include a second access road to Barry Island as a main road and not related to on-street housing. Waterfront development should also include significant commercial investment areas as part of schemes to link public usage of Barry Island, the Waterfront and Barry town centre. Projects which encourage tourism and leisure development should be prioritised for job creation.
 - 6. The Old Pump House on the Waterfront has recently been refurbished and should be brought into public use, perhaps as a local museum as it is well located next to the new Premier Inn Hotel.
 - 7. Approximately two-thirds of available housing has come about through candidate sites with a further third due to the unexpected availability of 'windfall' sites. These windfall sites provide an ad hoc rather than planned housing solution as they are judged individually on their merits rather than as part of the wider LDP.
 - 8. However, it is possible to identify potential 'windfall' sites as a result of unused brownfield land spaces, e.g. the former park between Gladstone Road and Tynewydd Road or the current campus of the Cardiff and Vale College on Colcot Road if they move to the Waterfront. The golf course area at Brynhill, another potential 'windfall' location, should not be considered a brownfield site and development of this location should be opposed.
 - 9. Following the serious flooding incidents in Barry in 2007, due care and attention must be paid to flooding concerns and drainage issues in all developments.
 - 10. Cemetery Approach in Barry should remain a peaceful and green space as intended by the town's founders in the nineteenth century.

(ordered by Representation ID No.)

Representor ID and details: 4882/DP1 Dr lan Johnson

- 11.lt is unclear why the proposed primary school on the Waterfront should be demarcated as an English-language primary school. An assessment of educational needs should take place as the population of the area increases
- 12. The principle of a rail connection with Cardiff Wales Airport should be supported. However, due attention must be paid as to whether this spur can be accessed from both west and east and any affect that this may have on the number of trains which can service the Vale of Glamorgan line. The proposed electrification of the railway line provides an opportunity for construction work.
- 13. The use of 'fracking' in the Vale of Glamorgan should be opposed on environmental grounds.
- 14. The proposed introduction of large numbers of housing in southern Barry will have knock-on transport effects upon the main roads to Cardiff, particularly the A4055 through Dinas Powys. With substantial housing also proposed for Dinas Powys this will lead to inappropriate pressure upon the road network in the village. A bypass for Dinas Powys would relax these pressures within the village and speed traffic flow between Barry and Cardiff.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



Representor ID and details: 4883/DP1 Julie Madge							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform		our comments to be cons at a hearing session of F		
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the F Procedural Tests - P	Plan is unsound and do P1 - No	es not not meet o	one or more test(s) of	soundness, please indica	ate which test(s) that	at it fails.
	Consistency Tests - C	C1 - No	C2 - No	C3 - No	C4 - No		
	Coherence and Effectiver	ness Tests - CE1 - N	o C	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph N	<u>umber:</u> <u>P</u>	Proposal Map:	Cons	straints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your represe	entation? Unanswer	ed (If "	No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?		Amended Policy: Ne	ew Paragraph:	Amended Paragrap No	h: New Or Amended Sit	te: Other (see Note	<u>es):</u>
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit the Site Name:	site as a Candidate Si	te? No	(If "Yes", pleas	se give the Candidate Si Site Reference:		ence if known)
3e - Please set out your representation below:							
A a resident of Windyridge, Dinas Powys, I wish to expres	s my concerns re the imp	lications of the effect th	nat the proposed a	additional housing wor	uld have on our local cor	nmunity.	
P.134. paragraph MG2 - Land adjoining St Cyres School, 'my main concern regarding the above proposal is the roa parking outside tehir properties. There is no likely way tha	d infrastructure. Murch Ro	oad, the main thorough				oad, mainly through	house owners
There is also a problem of the increased traffic queing out and land development proposals in Sully, Penarth and Su				rning and evening time	e. With rpoposed building	g of 2000 houses or	n Barry Waterfront
This will also exacerbate the air pollution levels which are	already excessive., and o	bviou <mark>sl</mark> y effect pupils a	t the Dinas Powy	s Infants School.			
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sou	and (if relevant)					
I am not naïve as to think that no development will go ahe the existing school as a community centre, there are a nut there are tennis courts, a gym, rugby and football pitches houses built on the land, just not as many as proposed, so	mber of facilities which co etc. for our local sports clu	uld be used without an ubs to utilise. Various o	y large amount of	money being spent, a	a kitchen and hall could b	be used for the elde	erly residents clubs,
4b - If you wish to speak, please confirm which part of your rep Road infrastructure!!!!	resentation you wish to sp	peak to the inspector a	bout and why the	y consider it be neces	sary to speak at the hea	ring -	

(ordered by Representation ID No.)

Representor ID and details: 4884/DP1 Mrs Merry Metcali	:						
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform	•	•	be consiered by 'writter sion of Public examination	•
•	2b - If you think that the Procedural Tests -		nd does not not mee P2 - No	et one or more test(s) o	of soundness, plea	ase indicate which test(s)) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	iveness Tests - CE	1 - No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragra	ph Number:	Proposal Map:		Constraints Map	Appendices:
							• • • •
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation?	(1	f "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy: No	New Paragraph:	Amended Paragra	nph: New Or Ame	ended Site: Other (see No	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name:	the site as a Candida	te Site? Unanswe	red (If "Yes", ple	· ·	didate Site Name and reference:	ference if known)
				_			

3e - Please set out your representation below:

I refer to the above plan and wish to make the following comments for your consideration.

As a resident in Murch I wish to express my concerns about the effect that the proposed building of additional housing would have on the local roads and services, both in Murch and the surrounding areas.

It is proposed that a minimum of 400 houses are to be built, both in the grounds due to be vacated by St Cyres High School in June of this year and along Caerleon Road. Both sites are on the Murch side of Dinas Powys which is served by only two access points to the A4055 main road; the junction, with traffic lights, by the Infants School and at the narrow bridge that joins Cross Common Road to the A4055 a little further west. Both these junctions are already at capacity or structurally suspect.

I would imagine, based on national averages, that these 400 additional houses will generate between 400 and 800 additional cars in both directions, especially peak times. Peak times also coincide with children arriving and leaving the infant school and additional school buses ferrying high school children to and from the St Cyres Penarth campus. Therefore the additional traffic created by these additional homes will have a profound and adverse impact on the local community who are already encountering major traffic delays at peak times.

I am also very much concerned that there appear to be no plans to provide additional community facilities for the residents in Murch whilst introducing an additional potential 400 families to the immediate area. Already we are finding that the local sports facilities are inadequate for current community needs and these will no doubt increase with the addition of another 400 homes. We are also without a permanent home for our local church and are in desperate need for a new medical facility that has parking facilities; at present the only GP practice in the area is on the opposite side of the A4055 and has no parking facilities at all for patients!

I am at a loss to understand the logic behind the proposals to tear down the St Cyres campus buildings in Murch when they are in a good structural condition and only need a small investment to make them a very much needed asset to the local community. To simple raze the buildings without any consultation with the local residents shows a complete disregard for their opinions which, to the best of my knowledge, has not been canvassed or sought in any way prior to the publication of this local development plan.

Also, with the closure of the Murch campus, there will have to be additional bus traffic at peak times to provide transport for the current Murch High School students to the Penarth site, without the potential need for even more buses for any additional children brought into the area with the proposed building of 400 more homes!

I note that the Deposit plan does not provide any plans for the provision of additional public transport along those routes covered by the Development Plan. Providing additional trains into Cardiff and along the Barry route will be a major challenge as I understand that there is a serious shortage of rolling stock within Wales. There will already be additional buses providing transport to St Cyres School; this does not take into account the need for further public transport for additional commuters travelling to and from work and any additional busses will, of course, be caught up in the traffic chaos that your proposed additional housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 4884/DP1 Mrs Merry Metcalf

In addition, whilst the Penarth Campus of St Cyres school has arranged temporary portacabin classrooms for the current Murch students from June of this year until the completion of the new build high school in two years time, these additional classrooms will not be sufficient to accommodate an influx of potentially hundreds of new students from the proposed 400 additional homes.

The Penarth campus is already at full capacity and struggling to cope with student numbers in inadequate classrooms and facilities. Whilst the new school will provide the much needed space for the current student numbers, this will not be available for at least two years and, even then, may not be sufficient for a large influx of students within its catchment area.

On the wider plans for the Vale of Glamorgan, some 10,000 homes are planned, many in the south east area of the Vale, and 2,000 have already been approved at the Waterfront complex in Barry. However I can find no plans to improve traffic conditions along the A4055 bottle neck route into Cardiff especially at the Merrie Harrier traffic lights, also the main bus route for students at St Cyres High School, The proposals in Lavernock, Sully, Penarth and the land adjacent to St Joseph's School on Sully Road will also, no doubt, create additional congestion to this already oversubscribed traffic route.

As I am sure you are already aware, due to the restricted river crossings into the Bay area of Cardiff, the A4055 is always highly congested with traffic. not only at at peak times, and is often at a standstill spewing out engine fumes into the local environment. In fact the air pollution levels are already registering excessive pollution. The nitrogen dioxide levels are recorded as being 43.8 units against a maximum recommended level of 40 units along the Cardiff Road in Eastbrook. Any increase in vehicular use, especially standing traffic, would exacerbate this situation. If levels of other emissions along this route are available, such as carbon monoxide and particulates. I would suggest that you examine these carefully and provide data to the residents in these areas before proposing an increase in traffic use. To do otherwise would, in my opinion, be reckless and you would be in breach of your duty of care to these communities.

Whilst accepting that new housing may well be needed within the Vale of Glamorgan, this cannot be proposed without full and clear plans being published by the local council showing exactly how they plan to successfully address the concerns raised above in a timely fashion, as well as providing detailed plans on how they intend to meet the additional utility needs for such a large number of additional housing, such as power, water and sewage provision plus any knock on effects that these may have to the current housing population.

In my view you have failed to provide clear and concrete plans for the required major highway and utility improvements needed before proposing the building of so many new homes within the Vale and, as such, I reject them as being ill-thought and incomplete.

I would welcome your comments on this response.

Please confirm receipt of this response, sent electronically through the Vale of Glamorgan website on Sunday 1st April 2012.

Yours sincerely

Mrs Merry Metcalf

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -MG2 [19]

(ordered by Representation ID No.)

Representor ID and details: 4884/DP2 Mrs Merry Metca	lf					
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			red by 'written representations' or do blic examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		I does not not mee P2 - Yes	t one or more test(s) of	soundness, please indicate	which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 - Yes	
	Coherence and Effect	iveness Tests - CE1	- No	CE2 - Yes	CE3 - No C	E4 - No
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:	Constra	aints Map Appendices:
	MG2(19)					• • • •
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	h: New Or Amended Site:	Other (see Notes):
	Yes	No	No	No	No	No
	Notes:					
3d - If your representation relates to a new, deleted or amend	ed site, did you submit t Site Name:	the site as a Candidate	Site? No	(If "Yes", plea	se give the Candidate Site Site Reference:	Name and reference if known)

3e - Please set out your representation below:

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Also, with the closure of the Murch campus, there will have to be additional bus traffic at peak times to provide transport for the current Murch High School students to the Penarth site, without the potential need for even more buses for any additional children brought into the area with the proposed building of 400 more homes!

I note that the Deposit plan does not provide any plans for the provision of additional public transport along those routes covered by the Development Plan. Providing additional trains into Cardiff and along the Barry route will be a major challenge as I understand that there is a serious shortage of rolling stock within Wales. There will already be additional buses providing transport to St Cyres School; this does not take into account the need for further public transport for additional commuters travelling to and from work and any additional busses will, of course, be caught up in the traffic chaos that your proposed additional housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 4884/DP2 Mrs Merry Metcalf

In addition, whilst the Penarth Campus of St Cyres school has arranged temporary portacabin classrooms for the current Murch students from June of this year until the completion of the new build high school in two years time, these additional classrooms will not be sufficient to accommodate an influx of potentially hundreds of new students from the proposed 400 additional homes.

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Whilst accepting that new housing may well be needed within the Vale of Glamorgan, this cannot be proposed without full and clear plans being published by the local council showing exactly how they plan to successfully address the concerns raised above in a timely fashion, as well as providing detailed plans on how they intend to meet the additional utility needs for such a large number of additional housing, such as power, water and sewage provision plus any knock on effects that these may have to the current housing population.

In my view you have failed to provide clear and concrete plans for the required major highway and utility improvements needed before proposing the building of so many new homes within the Vale and, as such, I reject them as being ill-thought and incomplete.

I would welcome your comments on this response.

Please confirm receipt of this response, sent electronically through the Vale of Glamorgan website on Sunday 1st April 2012.

Yours sincerely

Mrs Merry Metcalf

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -MG2 [19]

(ordered by Representation ID No.)

Representor ID and details: 4885/DP1 John Thomas						
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform	, ,		ered by 'written representations' or do blic examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that th Procedural Tests -		I does not not mee P2 - No	et one or more test(s) of	soundness, please indicate	e which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 - No	
	Coherence and Effecti	iveness Tests - CE1	- Yes	CE2 - Yes	CE3 - No C	E4 - No
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:	Constra	aints Map Appendices:
						• • • •
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan'	New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	h: New Or Amended Site:	Other (see Notes):
	No	No	No	No	Yes	No
	Notes:					
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name: Developm			` '	ise give the Candidate Site Site Reference: I	Name and reference if known) MG2(17)

3e - Please set out your representation below:

I believe that the Deposit Plan is unsound on the basis of consistency Test C1 and Coherence and Effectiveness Tests CE1 and CE2. The LDP does not set out a coherent strategy from which its policies and the allocations logically flow. The proposed development at the site adjacent to St Josephs School on Sully Road is not consistent with The Vale of Glamorgan Community strategy 2011-2021 which states at paragraph:

- 2.20 that a coordinated approach to improve the quality of life in the Vale of Glamorgan will be adopted, and
- 2.22 that the quality of the natural environment should be protected and enhanced, and
- 2.23 will provide a framework that would play an important role in the delivery of many of these priorities outcomes.

In order to impose development in unsustainable areas the Local Development Plan over the period in question reduces the contributions made by Unallocated Windfall and small sites by 25% because of the current economic climate. This change is made without any evidence for the reasoning behind it and it is submitted that the current economic climate will actually increase these Unallocated Windfall and small site developments. Simply by anticipating the volume of contributions will remain constant from the unallocated windfall and small sites will add 1060 dwellings to meet the needs of the Vale of Glamorgan over the period of the LDP. It is difficult to believe that this counting adjustment has been done for any other reason than to impose unwanted development in areas of the Vale in which it is unsustainable. The LDP must be amended in order to avoid this un-evidenced adjustment of figures to directly impact the sustainability of the natural environment throughout the Vale of Glamorgan.

Paragraph 4.3 of the LDP states that development should be in sustainable locations to enable the Vale of Glamorgan to meet housing needs and support the role and the function of existing settlements, it further states that we should foster a sustainable future in the natural resources of the Vale of Glamorgan and make a positive contribution towards reducing the impact of climate change.

- •Safeguard and enhance the vitality and viability of existing retail and tourist attractions that encourage the people to enjoy the diverse range of facilities.
- •The Vale of Glamorgan also proposes to favour proposals which protect and enhance tourism and leisure.
- •Provide sustainable transport including walking and cycling works and infrastructure improvements.
- •The proposed development at the site adjacent to St Josephs school on Sully Road is not consistent with any of these priorities and will damage the Sustainability of the Cosmeston Lakes Country Park.

The strategy outlined in 5.20 is not sound and conflicts with SP1 (5&6) as shown in paragraph 5.36 the development at the St Josephs site will have an unacceptable effect on the character of the area, and 5.37 this development will erode the settlement boundaries which the plan states will be maintained.

Under SP10 The protection of the Natural Environment 5.74 states that the LOP will protect the natural and built environment while SP11 states that it is a Vale of Glamorgan policy to be 'the great lung of South East Wales' however the development at the site adjacent to St Josephs will undermine the role of Penarth as a Service Centre and it will have an unacceptable impact on the natural environment In the area.

(ordered by Representation ID No.)

Representor ID and details: 4885/DP1 John Thomas

The Sustainability Assessment states at appendix 23.19 that Wildlife corridors are just as important as buffer zones between settlements and that all development must ensure the sustainability of the natural environment however this chosen site is proposed to be built directly on a wild life corridor adjacent to a Site of Special Scientific Interest in Cosmeston Country Park.

The Sustainability Assessment at MG214.113 also states that new development must not detract from the special quality of an area and the development at the St Josephs site will directly impact the quality of Cosmeston Country Park Site of Special Scientific Interest. The sustainability assessment Section MD5 part 1 states that the LDP failed this sustainability test and I submit that the revised LDP does not address this failure.

The attempt by the Vale of Glamorgan to utilise the expansion of Cosmeston Country Park by 27 Hectares during the period of the previous UDP, which was the minimum required to ensure the Cogan Hall Farm development was sustainable, to justify the destruction of vital wildlife corridors at the St Joseph School site which feed this Site of Special Scientific Interest must not be allowed to pass.

Policy MD3

Point 3 states the development will not be allowed if destroys existing features and at Point 4 and Point 5 further supports this proposition however the proposed development at the St Joseph school site will ultimately destroy the Site of Special Scientific Interest currently contained within Cosmeston Country Park and will ensure that Cosmeston Lakes as a tourist attraction in the Vale of Glamorgan will not be sustainable in the future.

Policy MD4 point 4 and point 7 are again contradicted by the development at the St Joseph school site given that this site will reduce public open space and recreation facilities at Cosmeston Country Park and will also ensure that, because of the lack of a wild life corridor, the decision to develop this site on Sully Road directly contradicts the LDP commitments to nature conservation.

It is noted at 6.18 of the LDP that Planning Policy Wales states that unacceptable development should never be allowed because of unrelated benefits and I submit that the development at St Josephs school is an unacceptable development that should never be allowed because of it contradicts the policies outlined by the Vale of Glamorgan and the National Planning arrangements.

Within the LDP MD5 states that the environmental protection Is important and that any development which will cause the pollution of the land or air (point 1) or noise odour vibrations and light nuisance (point 4) will be opposed, it is submitted that the development at St Joseph's will directly impact environmental quality of the site of special scientific interest (Cosmeston Lakes Country Park) and must therefore be removed from the LDP. Paragraph 6.23 states that if an existing problem will be made worst planning permission will not be granted and further states that, in MD6, Maintaining Biodiversity - developers must be able to demonstrate that the development could not be located elsewhere and 3.25 and 6.26 outline that if a development's impact would be unacceptable particularly on the biodiversity then it will be opposed. The development at St Joseph's school is not a question of the competing interests of Housing and Residential requirements of the people of the Vale of Glamorgan versus the natural environment rather it will directly impact upon a site of special scientific interest \ which provides tourism to people throughout the Vale of Glamorgan and beyond and any decision to allow development on the fringes of this country park has the potential to destroy the biodiversity of this region and ensure that future generations in the Vale of Glamorgan are left with a water filled quarry rather than a thriving site of special scientific interest meeting the biodiversity and environmental obligations of the Vale of Glamorgan now and the years to come.

Policy MG2 Part 7 must be removed in order to ensure the sustainability of the LDP Policy and MG6 states at 3 and 4 that unacceptable impacts which would result in the loss of tourism facilities should be opposed.

It is also submitted that the settlement boundaries have been incorrectly drawn because the development at St Joseph's School will ensure that Dinas Powys and Penarth are scheduled to become one Service Centre within the period of the Local Development Plan, and Paragraph 7.32 this development will not be appropriate because of the impact to its surroundings. It is also submitted that the development of seventy houses at the St Joseph's site is

In breach of MG8 Paragraph 2 in which housing developments will not be allowed to reduce local amenity and Paragraph 7.94 and 7.95 of MG22 will be breached by the development at St Joseph's.

I would also highlight MD6 of the sustainability assessment Paragraph 4.83 in which policy must make reference to the role and function of the settlement, Penarth's ability to act as a service centre would be significantly reduced by it's amalgamation with Dinas Powys.

MG21 Paragraph 4.112 any new development must not detract from the special qualities of an area and the inevitable destruction of the site of special scientific interest and developing biodiversity in Cosmeston Country Park will ensure that the LDP as currently drafted, with the inclusion of the development at the St Joseph's School site is a document without coherence which does not take account of its own stated obligations and policies for the benefit of people living in the Vale of Glamorgan today.

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

Representor ID and details: 4886/DP1 Stephen Lowe							
Date LodgedStatusPetition and No.Supporting Evidence01/04/2012M0	Additional SA SEA		Rep format: Eform	,	,	o be consiered by 'writte ssion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound and d P1 - No	oes not not mee	et one or more test(s)	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	- No	
	Coherence and Effecti	iveness Tests - CE1 - N	No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph I	Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			
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4h - If you wish to speak please confirm which part of your re	presentation you wish to	n speak to the inspector :	ahout and why t	hey consider it he nec	essary to speak a	t the hearing -	

Representor	ID and	details:	4887/D	P1 Phillip Keenan										
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					Coherence and Effect	tivenes	s Tests -	CE1 -	No	C	CE2 - No	CE3 - No	CE4 - No	
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- 3e Please set out your representation below:
 - Reasons for opposing proposed housing developments at Cosmeston & Swanbridge Road
 - There is already a housing development of 377 residential units in construction at Penarth Heights, which equates to approximately 600 extra vehicles (average 1.5 vehicles per home) trying to utilise an already congested road system.
 - There are 450 residential units proposed at the Cosmeston site which would equate to approximately a further 700 extra vehicles trying to utilise this already congested road system.
 - There are 650 residential units proposed at the Swanbridge site which would equate to approximately a further 1000 extra vehicles trying to utilise this same congested road system.
 - It has already been stated by local councellors that 'it is impossible to build new roads in an already congested area'.
 - •The residents of the proposed site at Swanbridge would have to use either Lavernock Road, Redlands Road and Barry Road to access Cardiff at either Barry Road / Penlan Road junction or Barry Road to the same effect.
 - The residents of the proposed site at Cosmeston would have to use Lavernock Road, Redlands Road and Barry Road to access Cardiff at either Barry Road / Penlan Road junction or use various side roads to access Windsor Road to again converge at the Barry Road / Penarth Road junction. Some will try to access the same junction via the marina roads but again all roads converge at the Barry Road / Penarth Road junction.
 - By the time the above developments take place the Penarth Heights residents will already have swollen this bottleneck of a junction by 600 vehicles.
 - -At peak travelling times these main road arteries service many schools and it can be witnessed that the congestion is unacceptable at present, never mind the possibility of an extra two thousand vehicles attempting to converge on an already overworked system.
 - •The road surfaces in and around Penarth are bad enough now and will get worse with the additional traffic and how would repairs be carried out.
 - ·The hospital at Llandough may also be affected.
 - If it was projected that only 25% of the potential new residents had school age children, an extra 370 school places would have to be found if only at one child per family realistically it will be more like an

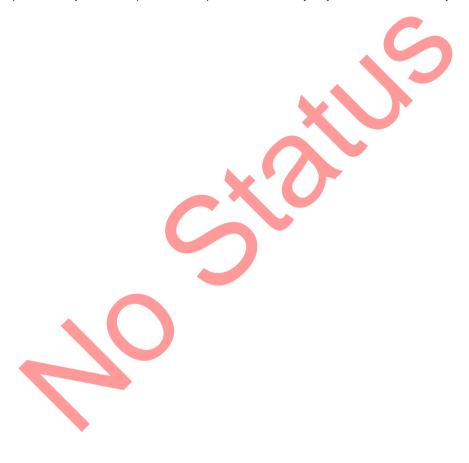
(ordered by Representation ID No.)

Representor ID and details: 4887/DP1 Phillip Keenan

additional 750 places.

In summary – THESE PROPOSALS ARE COMPLETELY UNACCEPTABLE

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



Representor ID and details: 4888/DP1 Susan Keenan							
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3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragra	oh Number:	Proposal Map:		Constraints Map	Appendices:
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- 3e Please set out your representation below:
 - Reasons for opposing proposed housing developments at Cosmeston & Swanbridge Road
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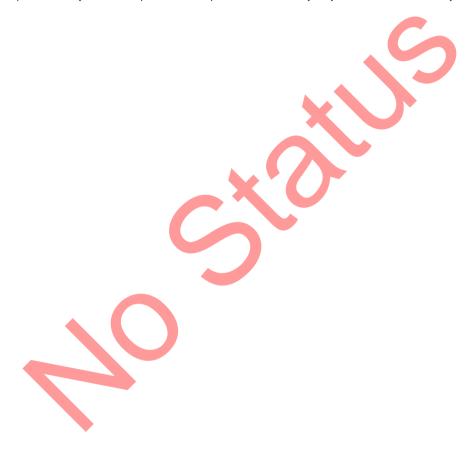
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Representor ID and details: 4888/DP1 Susan Keenan

additional 750 places.

In summary – THESE PROPOSALS ARE COMPLETELY UNACCEPTABLE

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



Representor ID and details: 4889/DP1 Brigitte Gater							
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3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u> 	i Number:	Proposal Map:		Constraints Map	Appendices:
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and the subsequent increase in traffic, it is an absolute ni						nake any provision for th	e increase in nousing
There is a bottle neck of traffic over the railway bridge at a result of the housing proposal.	the Tesco roundabout, t	this is already chaos in	the morning your	plans do not address t	his and no measu	res are in place to ease	the increased traffic as
I appreciate that new housing is needed but I am sadden to live in the future.	ed by the use of green f	ield sites, the Vale will	become an urban	conurbation with no ga	aps between Pena	arth, Dinas and Barry. Th	is is not a place I want
3f - Please outline the changes you wish to see made to the D I found the plans so complicated that I am not sure I fully		,	I a six week cons	ultation for a plan which	n takes us to 2026	is not sufficient.	
I would like to see more ways we could exploit sea/river to	axis, the barrage and im	proved reliable public t	ransport. Buses a	are not a solution as the	ey get totally clogg	ed up in the traffic.	
4b - If you wish to speak, please confirm which part of your re	oresentation you wish to	speak to the inspector	about and why the	hey consider it be nece	ssary to speak at	the hearing -	

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Representor ID and details: 4890/DP1 Andrew Guy Bate	es						
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	Coherence and Effect	tiveness Tests - CE	1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
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				7			

3e - Please set out your representation below:

WG - Welsh Government

G&T – Gypsy and Travellers

VoG – Vale of Glamorgan

TEST P1

- 1. This has not been prepared in accordance with the Community Involvement Scheme:
- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9.
- Registered consultees have not been informed of the consultation stages.
- According to the WG (Travelling to a better future) there is an onus on the LA to consult with its strategic partners in delivering G&T sites. No consultation has taken place.
- Good practice (WG Good Practice Design in designing GT sites) suggests where G&T are concerned the local community should be engaged as early as possible I believe that the VoG has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the G&T site in accordance with best practice.

TEST P2

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

TEST C

1.The Land Use Plan (with regards to G&T) does not relate to any strategy – The Housing Strategy is out dated and does not provide any structure for assessing G&T needs or site location.

TEST C2

- 1. The Site allocation (in regards to G&T) does not have regard to National Policy:
- Welsh Government Circular (30/2007)
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (shops; transport; health etc); both Llangan and Fferm Goch Score 0 points in the evidence based assessment SUSTAINABLE SETTLEMENTS APPRAISAL
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Business would be operated from the site in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.

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Representor ID and details: 4890/DP1 Andrew Guy Bates

- Recent application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VoG has refused an application in Bonvilston on the basis of Sustainability and services were closer to this site.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus Refuse area; office; play area; infrastructure (roads etc)
- The site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 2.5m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit land with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- The guidance requires that sites are:
- •Sustainable this proposal is not
- •are equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- •have the effect of encouraging and developing good relations between Gypsy Travellers and the settled community the scale of this proposal can only result in fear and tensions with the local community.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward which the VoG has not done. "Situating transit provision on residential sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales
- Is greenfield land in accordance with the definition of brownfield land set out in Figure 4.1 of PPW;
- Will not reduce the need to travel due to the limited local service provision in close proximity to the site;
- Holds very limited access to public transport facilities;
- Is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- Is located within a Special Landscape Area and in close proximity to a Conservation Area;
- Does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham evidence);
- Does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- Does not maximise opportunities for community development and social welfare;
- Does not foster social inclusion due to the isolated location of the site; and
- Does not contribute to improvements in health due to the isolation from services and facilities.

TEST C3

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

TEST C4

- 1.It does not have regard to the relevant Community Strategy.
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs" All services are miles away and inaccessible to the older community. The VERY POOR public transport system is located 1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".
- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment" There is no employment opportunity near to the site. The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The local industrial unit has raised concerns in relation to the scale of the proposal and the implied anti-social behaviour (evidenced by the travellers concerns themselves within the Fordham Report and the Guidance for G&T which recommends sites not larger than 14 units and not of mixed tenure permanent / transient).

TEST CE1

- 1. The Plan does not set out a coherent strategy which its policies and allocation logically flow:
- The Strategy makes the following statements:

(ordered by Representation ID No.)

Representor ID and details: 4890/DP1 Andrew Guy Bates

- The LDP will seek to provide a policy framework which:

Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

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

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

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place: That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."

The allocation of MG9 does not meet these objectives being in a Rural Location with inadequate facilities and transport links.

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

TEST CE2

- 1. The strategies; policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence;
- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2.The G&T site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the G&T site assessment states that this is good.
- 3.The G&T site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access. At 2.5m against a minimum 3.7m plus footpath of 1.2m.
- 4.The G&T site assessment does not reflect the current legal obligations of the Council, yet the other site assessments highlight legal issues.
- 5. Several Private sites were put forward as candidate sites for G&T but were dismissed as they were not in Council ownership what was the point of asking the private sector.
- 6. The key issue is that the site allocation does not reflect the identified need of the G&T community as highlighted in the Fordham report.
- 7.The G&T site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site.
- 8. The assessment makes no reference that the site is in a Special Landscape Area.
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is questionable. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that 0 new jobs have become available in the last 9 years and that the units employ less than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98) of the 5 sites with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet.
- 12. The VoG has undertaken a study (Fordham) where the message was extremely strong that the G&T community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives (This is a key point so should be strongly emphasised).

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Representor ID and details: 4890/DP1 Andrew Guy Bates

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

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

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

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

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

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

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

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

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

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

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

13.An independent highway study surrounding the proposed site has concluded that: "The1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment. "

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

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

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32, offers guidance where it states that a desirable minimum carriageway width of 5.5metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians. However, as there is no direct access off the lane (apart from into the proposed development)"

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

(ordered by Representation ID No.)

Representor ID and details: 4890/DP1 Andrew Guy Bates

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

TEST CE3

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

TEST CE4

- 1. Policy MD12 (G&T) is discriminatory. It offers no flexibility for the VoG to bring forward sites that are sustainable / suitable for G&T through the policies derived within the plan.
- 2.MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the RSL sector
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - 1. That the site MG9 is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.
 - 2. That Policy MD12 is amended so that it does not discriminate against the G&T community. All sites during the plan should be assessed on a similar basis as Affordable Housing.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Represento	r ID	and	detail	s:	4891/D	P1 CJ	Sollars										
Date Lodged 01/04/2012		Status M	<u>Pe</u>		and No.	. Suppo	rting Evidence	Additional SA SEA				Rep form				s to be consiered by 'writ session of Public examina	ten representations' or do ation? Written
2a - Do you	con	sider	the LE	OP is	Sound?	Unsou	nd	2b - If you think that t Procedural Tests -	he Plan is P1 -		und and do		not me	et one or more test(s)	of soundness, p	please indicate which test	t(s) that it fails.
								Consistency Tests -	C1 -	No		C2 -	No	C3 - No	C	4 - No	
								Coherence and Effec	tiveness	Tests -	CE1 - N	Ю		CE2 - Yes	CE3 - No	CE4 - No	
3a - Which p	oart	of the	Depo	sit P	lan are y	ou comr	menting on?	Policy Number:		Pa	aragraph N	lumber	 <u>:</u>	Proposal Map:		Constraints Map	Appendices:
								MG2(25)						MG2			
3b - Do you	wisl	n to se	ee any	/ cha	nges ma	ade to the	e Deposit Plar	as a result of your rep	oresentati	ion?	Yes		(If "No" or "Unanswer	ed" - go to 3d)		
3c - What ch	าลท	ges wo	ould lil	ke to	see mad	de to the	Deposit Plan	? New Policy: No	Ameno No	ded Po	licy: N		agraph:	Amended Parag No	raph: New Or A	mended Site: Other (se	e Notes):
								Notes:									
3d - If your	repi	esent	ation	relate	es to a ne	ew, dele	ted or amende	ed site, did you submit Site Name:	the site a	as a Ca	ndidate Si	te?	lo	(If "Yes", p	J	andidate Site Name and Reference:	reference if known)
	clus	ion of	site N	1G 2	(25) Lan	nd west c										ties do not exist within Su en worse gridlock than th	
There i prohibi			ceivab	ole wa	ay to ove	ercome ti	ne problem of	transport as roads whi	ch are alı	ready o	ver capac	ity canr	not be w	idened to cater for hi	gher volumes of	traffic, or if they could the	e cost would be considered
				•	•			eposit Plan to make it dential settlement bou			,	eviously	<i>'</i> .				
4b - If you w	wish	to sp	eak. r	olease	e confirm	n which r	part of your re	presentation you wish	to speak	to the i	nspector a	bout ar	nd why t	hev consider it be ne	cessary to speak	c at the hearing -	

(ordered by Representation ID No.

				, _ , _ , _ , _ , _ , _ , _ , _ , _ , _			Representation ID No.
Representor ID and details: 4892/DP1 Alex Willey							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0			Rep format: Eform			ne consiered by 'written on of Public examinati	n representations' or do
01/04/2012 WI							
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound ar P1 - Yes	nd does not not meet P2 - Yes	one or more test(s) of s	oundness, please	·	,
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 - Y	es.	
	Coherence and Effect	tiveness Tests - CE	1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	ph Number:	Proposal Map:		Constraints Map	Appendices:
	MG9			MG9			
b - Do you wish to see any changes made to the Deposit Pla		oresentation? Yes		"No" or "Unanswered"	go to 3d)		
c - What changes would like to see made to the Deposit Plar		Amended Policy:	New Paragraph:	Amended Paragraph	: New Or Amen	ded Site: Other (see	Notes):
	No	Yes	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amend	ed site, did you submit	the site as a Candida	te Site? Yes	(If "Yes", pleas	e give the Candid	date Site Name and re	ference if known)
	Site Name: Land eas	st of Llangan	X ' ()		Site Refe	erence: MG9 / ID22	
3e - Please set out your representation below:							
TEST P1							
1.That it has not been prepared in accordance with the C							
oThe Emergency Services and Local Primary school have oRegistered consultees have not been informed of the consulters.		y nave NOT been cor	isuited.				
oAccording the WG (Travelling to a better future) there is		consult with its strated	ic partners in deliveri	ina G&T sites. No cons	ultation has taker	n place.	
oGood practice (WG Good Practice Design in designing	GT sites) suggests who	ere G&T are concerne	d the local communit	ty should be engaged as			VoG has undertaken th
minimum consultation in terms of the LDP and insufficier	nt consultation with resp	pect to the G&T site in	accordance with bes	st practice.			
TEST P2							
1. That the sustainability appraisal is flawed and contradic	ctory – proposed sites of	do not meet with natio	nal policy in respect o	of sustainability. The all	ocation of Llanga	n is not consistent wit	h previous Planning
Rejections by the VoG which considered sustainability (E 2.The allocation of MG9 is not consistent with the propos	Bonvilston Sept 2011) a						, , , , , ,
TEST C1							

1.The Land Use Plan (with regards to G&T) does not relate to any strategy – The Housing Strategy is out dated and does not provide any structure for assessing G&T needs or site location.

TEST C2

- 1. The Site allocation (in regards to G&T) does not have regard to National Policy:
- o Welsh Government Circular (30/2007)

The site is RURAL and is "UNSUSTAINABLE" as there are no local services (shops; transport; health etc); both Llangan and Fferm Goch Score 0 points in the evidence based assessment SUSTAINABLE SETTLEMENTS APPRAISAL; does not take into account the "SCALE" of the resident community.

oDesigning Gypsy and Traveller Sites Good Practice Guide - The site is too small; therefore cannot meet the needs identified in the LDP. The guidance requires that sites are:

- •Sustainable this proposal is not
- •are equivalent to standards that would be expected for social housing in the settled community; the scale of this proposal can only result in fear and tensions with the local community.

oTravelling to a Better FutureRecommends that LA's engage with their Housing Association Partners to bring sites forward which the VoG has not done and that joint transit and residential sites not preferred by the Gypsy and Traveller community

oPlanning Policy Wales

Site is unsustainable

(ordered by Representation ID No.)

Representor ID and details: 4892/DP1 Alex Willey

TEST C3

1. The policy has due regard to the Wales Spatial Plan.

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

TEST C4

1.It does not have regard to the relevant Community Strategy.

oSite is miles from services with no public transport; no employment; health or retail opportunities

TEST CE1

1. The Plan does not set out a coherent strategy which its policies and allocation logically flow:

oThe Strategy makes the following statements:

The LDP will seek to provide a policy framework which:

Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

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

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

oThe LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place: That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."

The allocation of MG9 does not meet these objectives being in a Rural Location with inadequate facilities and transport links.

This is agricultural land in the Special Landscaped Area

TEST CE2

- 1. The strategies; policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:
- 1.There is significant contradiction in the evidence base. The comments in the Fordham report are not applied; the SSA states 0 points for public transport but the G&T site assessment states that this is good; G&T site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access. At 2.5m against a minimum 3.7m plus footpath of 1.2m.
- 2.The G&T site assessment does not reflect the current legal obligations of the Council, yet the other site assessments highlight legal issues.
- 3. Several Private sites were put forward as candidate sites for G&T but were dismissed as they were not in Council ownership what was the point of asking the private sector.
- 4. The key issue is that the site allocation does not reflect the identified need of the G&T community as highlighted in the Fordham report.
- 5. The G&T site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site.
- 6. The assessment makes no reference that the site is in a Special Landscape Area.
- 7. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site.
- 8.The allocation of Fferm Goch as a Minor Rural Settlement is questionable. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that 0 new jobs have become available in the last 9 years and that the units employ less than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 9.Fferm Goch has a population of less than 100 (98) of the 5 sites with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet.
- 10. The VoG has undertaken a study (Fordham) where the message was extremely strong that the G&T community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives (This is a key point so should be strongly emphasised).
- 11. There is complete in consistency with the allocation of MG9 against the proposed policies.

TEST CE3

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

TEST CE4

(ordered by Representation ID No.)

Representor ID and details: 4892/DP1 Alex Willey

1.Policy MD12 (G&T) is discriminatory. It offers no flexibility for the VoG to bring forward sites that are sustainable / suitable for G&T through the policies derived within the plan.

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

PART 3 F

1.We are suggesting that the site MG9 is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.

2. We are suggesting that Policy MD12 is amended so that it does not discriminate against the G&T community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

PART 4 A1. Tick either A (if you wish to speak at the public inquiry) or B (Llangan Action will arrange for spoken representation on your behalf).

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

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

Representor ID and details: 4893/DP1 Mr Andrew Surrice	lge						
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform		•	be consiered by 'writter sion of Public examination	•
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - No	does not not mee P2 - No	et one or more test(s) o	of soundness, plea	ase indicate which test(s)) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	tiveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrapl</u>	n Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your rep	resentation? No	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	nph: New Or Ame	ended Site: Other (see N	Notes):
	No	No	No	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amend	ed site, did you submit Site Name: Brynhill 0		Site? Yes	(If "Yes", ple	-	didate Site Name and reference: 2407/CS	rerence if known)
3e - Please set out your representation below: I am very pleased and relieved that the Council Planning need preserve our green and open spaces. I feel that a hinfstructure.	has ommited this site f ousing development or	from the LDP. There is a this site will not only h	so little green/leis ave an impact on	ure land left in the area the environment but w	i. I am glad that th ill cause havoc on	e Council along with the our already busy and co	people of Barry feel the ongested road
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your re	presentation you wish t	o speak to the inspecto	r about and why t	hey consider it be nece	essary to speak at	the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4894/DP1 Mr J Madge							
Date LodgedStatusPetition and No.Supporting Evidence01/04/2012M0	ice Additional SA SEA		Rep format: Eform	•	nt your comments to be consiered by 'written representations' or do lak at a hearing session of Public examination? Examination		
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -		and does not not mee	et one or more test(s)	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	· No	
	Coherence and Effec	tiveness Tests - (CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Para</u>	graph Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation?	()	If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy	New Paragraph:	Amended Paragra	aph: New Or Am	ended Site: Other (see	<u>Notes):</u>
	No	No	Yes	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candi	date Site? No	(If "Yes", ple	ū	didate Site Name and re eference:	ference if known)
				_			

3e - Please set out your representation below:

VALE OF GLAMORGAN DEPOSIT LOCAL DEVELOPEMENT PLAN 2011-2026

We the residents of 39 Windyridge, Dinas Powys, CF64 4AW, would like to make the following representations on the above proposals – in particular on the proposals affecting Dinas Powys Ref MG(19).

The consultation with local residents in respect of this proposal has been totally inadequate and not in accordance with the standards that the council has set itself. We find this extraordinary in view of the huge impact the proposal, if adopted, would have on their lives.

Indeed the Councils Representations Form itself makes it virtually impossible for the layman with no planning expertise to complete. It refers to several documents totalling thousands of pages, which relate to the whole of the Vale of Glamorgan. It is very difficult, if not impossible, in such a short space of time, to find and understand the information relating specifically to Dinas Powys and the evidence and data that led to it's being earmarked for such a large housing development. There is no summary or reference guide of issues relating to the Dinas Powys site to help find your way through such a mass of documentation.

The Welsh Assembly Government's booklet emphasises the importance of consultation with the local community in the Plan preparation, as they hold the local knowledge. This criteria has clearly not been adhered to here. We and many of our neighbours have struggled to make sense of it!

We have therefore listed our representations below: -

Traffic congestion

The LDP will create 5000 new houses in the Barry, Penarth, Sully, Dinas Powys and Llandough areas. Over 4000 of these will are in an area that will add to the existing traffic pressures on the A4055 at Dinas Powys. This road is already at capacity in peak times, indeed some 10,000 cars travel each way along Cardiff Road Dinas Powys each day. These traffic pressures are compounded at the Merrie Harrier and Barons Court road junctions.

The proposed housing developments in Dinas Powys are all on the Murch side of the community. There are only two points of access to the main A4055 road from this side of the village – the traffic lights at the Murch Bridge/Infants school junction and at the Cross Common Road Junction. Both of these junctions are at capacity now and the latter is structurally suspect. In fact both bridges would struggle to cope with the increased volume of traffic caused by the further 600-800 cars each way per day that the proposed 400 unit developments would generate.

In addition the proposed development of 350 houses on the site of the current Dinas Powys St Cyres school site is unrealistic. The access roads would not be adequate to meet the needs of the traffic generated. Murch Road, Murch Cres and Windyridge are too narrow and are unable to cope. Sully Road, Cross Common Road or Sunnycroft Lane could be adapted but this would not alleviate the main traffic

(ordered by Representation ID No.)

Representor ID and details: 4894/DP1 Mr J Madge

concern - that of the traffic congestion on the A4055 and Merrie Harrier and Barons Court junctions.

The South East Wales Transport Alliance Highway Strategy Study (2008) identifies the A4055 through Dinas Powys as a key problem area of the regional road network as a consequence of the scale of traffic and associated congestion. The LDP acknowledges this problem and supports the principle of a Dinas Powys Bypass but states that it is unlikely that it would come to fruition during the Plan period.

It is therefore hard to believe that the Deposit Plans assertion that "local highway and junction improvements" will be sufficient to deal with the extra traffic. There is no evidence given to support this.

Pollution

The increased traffic will also produce increased levels of air pollution. We understand that the Nitrogen Dioxide (NO2) levels recorded along Cardiff Road already exceed the maximum recommended levels. An increase of vehicles particularly standing traffic would exacerbate the situation. There are no results for CO2 and PM10 emissions but surely there is a need for some research here.

Sewerage

The existing sewerage and drainage network, now publicly owned, is already causing concern and would be inadequate to cope with a further increase in housing and population.

Infrastructure

The impact of the increased population, such a large development would have on the infrastructure of the village has not been considered. There are no proposals to address the need for increased schools, medical services, policing, sports and leisure facilities and other community services. For example the Health Centre on Cardiff Road is already struggling with lack of space and facilities to meet the needs of the existing residents.

Environment

We are concerned that Greenbelt land will form part of the housing development proposed at ref MG2(19) despite the Councils claims that Brownfield sites will be given priority over Greenbelt. This raises environmental issues and we need proper consideration of the impact of building on Greenfield sites.

We can find no reference in the proposal to detailed environmental and social impact assessments having been made prior to the selection of the Dinas Powys site MG2(19). Surely this should be done before such a site is selected for such a large development.

In conclusion we object to the inclusion of the Dinas Powys site MG2(19) in the LDP for the reasons listed above and ask that it be removed.

Jonathan Madge Allison Madge Judith Lewis

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - We would like to see measures taken to address the increased traffic and congestion before any proposals are considered.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing With particular reference to Windyridge DINAS POWYS.

Representor	ID and	details:	4895/D	P1 Donald Surridge							
Date Lodged 01/04/2012		Petition	on and No.	Supporting Evidence	Additional SA SEA		<u>Rep format:</u> Eform			to be consiered by 'writte ession of Public examinat	
2a - Do you co	onsider t	he LDP	is Sound?	Sound	2b - If you think that the Procedural Tests -		d and does not not me P2 - No	eet one or more test(s)	of soundness, pl	ease indicate which test(s) that it fails.
					Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
					Coherence and Effec	tiveness Tests -	CE1 - No	CE2 - No	CE3 - No	CE4 - No	
3a - Which pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:	<u>Para</u>	agraph Number:	Proposal Map:	,	Constraints Map	Appendices:
3b - Do you w	ish to se	e any cl	nanges ma	ide to the Deposit Pla	n as a result of your rep	presentation? N	0	(If "No" or "Unanswere	ed" - go to 3d)		
3c - What cha	nges wo	ould like	to see mad	de to the Deposit Plan	? New Policy:	Amended Polic No	<u>v:</u> <u>New Paragraph</u> No	Amended Paragr No	aph: New Or An	nended Site: Other (see No	Notes):
					Notes:						
3d - If your re	present	ation rela	ates to a n	ew, deleted or amend	ed site, did you submit Site Name: Brynhill (didate Site? Yes	(If "Yes", pl	J	ndidate Site Name and re Reference: 2407/C5	ference if known)
3e - Please s	et out y	our repre	esentation	below:							
We mus When w With all	t keep a alking m this hap	s much y dog i v pening it	as possible ery much will have a	build on green land si e this beautiful area of enjoy looking across to a serious impact on Brid locked at certain tir	green land. the golf course, see the arry.	birds and the oth	er wild life and what a	calamity this would be	if this was spoilt.		
3f - Please o	utline the	e change	es you wish	n to see made to the [Deposit Plan to make it	sound (if relevant)				
4h - If vou wi	sh to sn	eak nlea	se confirm	which part of your re	nresentation you wish t	to speak to the ins	enector about and why	they consider it he nec	ressary to sneak	at the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4896/DP1 Clare Bates							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform		•	•	n representations' or do on? Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		nd does not not mee	et one or more test(s) o	f soundness, plea	se indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 -	Yes	
	Coherence and Effect	tiveness Tests - CE	1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragra	aph Number:	Proposal Map:		Constraints Map	Appendices:
	MD12			MG9			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	()	If "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: No	Amended Policy: Yes	New Paragraph: No	Amended Paragra No	ph: New Or Ame Yes	nded Site: Other (see I	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit Site Name: Land Eas		ite Site? Yes	(If "Yes", ple	· ·	lidate Site Name and re ference: MG9/ID22 App	,

3e - Please set out your representation below:

WG - Welsh Government

G&T – Gypsy and Travellers

VoG – Vale of Glamorgan

TEST P1

- 1. This has not been prepared in accordance with the Community Involvement Scheme:
- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9.
- Registered consultees have not been informed of the consultation stages.
- According to the WG (Travelling to a better future) there is an onus on the LA to consult with its strategic partners in delivering G&T sites. No consultation has taken place.
- Good practice (WG Good Practice Design in designing GT sites) suggests where G&T are concerned the local community should be engaged as early as possible I believe that the VoG has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the G&T site in accordance with best practice.

TEST P2

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

TEST C

1.The Land Use Plan (with regards to G&T) does not relate to any strategy – The Housing Strategy is out dated and does not provide any structure for assessing G&T needs or site location.

TEST C2

- 1. The Site allocation (in regards to G&T) does not have regard to National Policy:
- Welsh Government Circular (30/2007)
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (shops; transport; health etc); both Llangan and Fferm Goch Score 0 points in the evidence based assessment SUSTAINABLE SETTLEMENTS APPRAISAL
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Business would be operated from the site in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.

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Representor ID and details: 4896/DP1 Clare Bates

- Recent application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VoG has refused an application in Bonvilston on the basis of Sustainability and services were closer to this site.

Designing Gypsy and Traveller Sites Good Practice Guide - The site is too small; therefore cannot meet the needs identified in the LDP.

- The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus Refuse area; office; play area; infrastructure (roads etc)
- The site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 2.5m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit land with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- The guidance requires that sites are:
- •Sustainable this proposal is not
- •are equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans

•have the effect of encouraging and developing good relations between Gypsy Travellers and the settled community – the scale of this proposal can only result in fear and tensions with the local community.

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

TEST C3

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

TEST C4

1.It does not have regard to the relevant Community Strategy.

- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs" All services are miles away and inaccessible to the older community. The VERY POOR public transport system is located 1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".
- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment" There is no employment opportunity near to the site. The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The local industrial unit has raised concerns in relation to the scale of the proposal and the implied anti-social behaviour (evidenced by the travellers concerns themselves within the Fordham Report and the Guidance for G&T which recommends sites not larger than 14 units and not of mixed tenure permanent / transient).

(ordered by Representation ID No.)

Representor ID and details: 4896/DP1 Clare Bates

TEST CE1

1. The Plan does not set out a coherent strategy which its policies and allocation logically flow:

- The Strategy makes the following statements:
- The LDP will seek to provide a policy framework which:

Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

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

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

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place: That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."

The allocation of MG9 does not meet these objectives being in a Rural Location with inadequate facilities and transport links.

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

TEST CF2

- 1. The strategies; policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence;
- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2.The G&T site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the G&T site assessment states that this is good.
- 3.The G&T site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access. At 2.5m against a minimum 3.7m plus footpath of 1.2m.
- 4.The G&T site assessment does not reflect the current legal obligations of the Council, yet the other site assessments highlight legal issues.
- 5. Several Private sites were put forward as candidate sites for G&T but were dismissed as they were not in Council ownership what was the point of asking the private sector.
- 6. The key issue is that the site allocation does not reflect the identified need of the G&T community as highlighted in the Fordham report.
- 7. The G&T site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site.
- 8. The assessment makes no reference that the site is in a Special Landscape Area.
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is questionable. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that 0 new jobs have become available in the last 9 years and that the units employ less than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98) of the 5 sites with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet.
- 12. The VoG has undertaken a study (Fordham) where the message was extremely strong that the G&T community wanted smaller sites located on the fringes of larger communities. The report confirmed that

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isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives (This is a key point so should be strongly emphasised).

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

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

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

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

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

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

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

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

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

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

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

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

13.An independent highway study surrounding the proposed site has concluded that: "The1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment. "

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

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

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

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Representor ID and details: 4896/DP1 Clare Bates

there is no direct access off the lane (apart from into the proposed development)"

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

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

TEST CE3

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

TEST CE4

- 1. Policy MD12 (G&T) is discriminatory. It offers no flexibility for the VoG to bring forward sites that are sustainable / suitable for G&T through the policies derived within the plan.
- 2.MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the RSL sector
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - 1. The site MG9 is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.
 - 2.The Policy MD12 is amended so that it does not discriminate against the G&T community. All sites during the plan should be assessed on a similar basis as Affordable Housing.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 4898/DP1 Rachael Mills							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			o be consiered by 'written ssion of Public examinati	
2a - Do you consider the LDP is Sound? Sound	2b - If you think that t Procedural Tests -	he Plan is unsound ar P1 - No	d does not not me P2 - No	et one or more test(s) o	f soundness, plea	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	· No	
	Coherence and Effect	tiveness Tests - CE	1 - No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	ph Number:	Proposal Map:		Constraints Map	Appendices:
		1.1 - Inti	oduction		7	Other - Please specify Agricultural land	Appendix 3 - Sites of Importance for Nature Conser
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your re	oresentation? Yes		(If "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: No Notes:	Amended Policy: No	New Paragraph:	Amended Paragra	ph: New Or Ame Yes	ended Site: Other (see I	Notes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidat	e Site? No	(If "Yes", ple	•	didate Site Name and re eference:	ference if known)
3e - Please set out your representation below: I write with reference to MG2 (7) and MG2 (4). We are ve Weycock Cross area is already heavily conjested. The hir Additionally, throughout the Summer months the traffic is There have been numerous accidents due to the amount household, this would lead to a significant increase in traff Additionally, we have concerns over the availability of infrunderstand how the already limited schooling facilities we admission issues due to the already high number of child The agricultural land has been farmed for many years an agricultural land should not be used for housing developm. 3f - Please outline the changes you wish to see made to the Development of the second of	busy at weekends, du of traffic and we are conficted from the surrounding astructure such as solved adapt to cope with the surrounding dis a place of natural ments. If a green belt weekends	constant throughout the te to mainly using Pontoncerned that this will area with increased a mools to service the properties of children or area.	e day, and are par sypridd Road to gal only get worse if the sociated traffic rise sposed developme if school age to the	ticularly bad during the on access to Porthkerry the proposal were to go a ks. In the basis of the carea as we understand	early morning and Park and Barry Is ahead. Even if ear development ence I that Rhoose Prin	d evening. sland. ch new house had an avectory puraging families to the amary and All Saints are co	erage of one car per area, we would want to currently experiencing
I would like MG2 (7) removed from the Plan.		to appoint to the fire re-	lor about and with	thou consider the second			
4b - If you wish to speak, please confirm which part of your re	presentation you wish	to speak to the inspec	for about and why	tney consider it be nece	ssary to speak a	t tne nearing -	

Representor ID and details: 4899/DP1 Mr and Mrs Sater							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	you want to spe	eak at a hearing se	ssion of Public examin	ten representations' or do ation? Examination
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	he Plan is unsound and P1 - Unanswered C1 - Unanswered	P2 - Unansw C2 - Yes	rered) of soundness, ple answered C4		t(s) that it fails.
		tiveness Tests - CE1		CS - OII	CE3 - Yes		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap		Proposal Map:	•	Constraints Map	Appendices:
	16						
3b - Do you wish to see any changes made to the Deposit Plar	ı as a result of your rep	oresentation? Yes	(If "	'No" or "Unanswe	red" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered	Amended Policy: Yes	New Paragraph: Unanswered	Amended Parag Unanswered	graph: New Or Am Yes	ended Site: Other (se Unanswe	e Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amended and a set out your representation below: Dinas Powys Castle, Land off Lettons Way / Pen-Y-Turny Please find enclosed, on behalf of and under instruction for This submission:	Site Name:	s			•	didate Site Name and eference:	,
-puts forward an Alternative Site Representation (and by a objects to selected policy provisions of the plan.	association a change t	o the settlement bound	ary); and				
For the Alternative Site Representation, the following info -a completed, signed and dated Deposit Plan Response I - a plan of the site put forward for consideration; and - a Sustainability Appraisal of the alternative site put forward.	Form;) enclosed:					
See supporting information							
3f - Please outline the changes you wish to see made to the D See supporting information	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your rel	•		•	ey consider it be ne	ecessary to speak a	at the hearing -	

Representor ID and details: 4900/DP1 Stuart Mills							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform		at a hearing sess	be consiered by 'writter sion of Public examination	
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - No	d does not not mee P2 - No	et one or more test(s) of			that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	iveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	oh Number:	Proposal Map:		Constraints Map	Appendices:
	LDP Strategy	1.10 - Int	roduction	MG2		Other - Please specify Agricultural land	Appendix 5 - Conservation Areas
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes		If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap		nded Site: Other (see N	
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	he site as a Candidate	e Site? No	(If "Yes", plea	ase give the Candi Site Ref	date Site Name and reference:	erence if known)
3e - Please set out your representation below:							
I write with reference to MG2 (7) and MG2 (4). I am very of Weycock Cross area is already heavily conjested. The high							Port Road and the
Additionally, throughout the Summer months the traffic is	busy at weekends, due	e to mainly using Pont	ypridd Road to gair	n access to Porthkerry F	Park and Barry Isla	and.	
There have been numerous accidents due to the amount household, this would lead to a significant increase in traf					ahead. Even if eac	h new house had an av	erage of one car per
Additionally, we have concerns over the availability of infrunderstand how the already limited schooling facilities wo admission issues due to the already high number of child	uld adapt to cope with	an influx of children of					
The agricultural land has been farmed for many years and agricultural land should not be used for housing developm	d is a place of natural benents. If a green belt we	eauty that provides ar ere in Wales, this woul	extremely good fild not be allowed.	rst impression of Barry a	and the Vale. Whi	st there are other brown	n field sites available,
3f - Please outline the changes you wish to see made to the D I would like MG2 (7) removed from the Plan.	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	presentation you wish t	o speak to the inspect	or about and why t	hey consider it be nece	ssary to speak at	the hearing -	

Representor ID and details: 4901/DP1 Graham Don							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			consiered by 'written r of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - No	does not not mee P2 - No	t one or more test(s) of	soundness, please i	ndicate which test(s) t	hat it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 - No		
		tiveness Tests - CE1 -		CE2 - Yes			
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>		Proposal Map:		Constraints Map	Appendices:
				MG2 (13) - Othe			
3b - Do you wish to see any changes made to the Deposit Plan				f "No" or "Unanswered"			
3c - What changes would like to see made to the Deposit Plan?		Amended Policy:	New Paragraph: No	Amended Paragraph No	h: New Or Amende Yes	ed Site: Other (see No	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	•	the site as a Candidate west of St Athan Rd Llan			-	te Site Name and reference: 2446/CS1 2446/	,
3e - Please set out your representation below: This field is part of a special landscape area which was de entrance to cowbridge from the south along St Athan road.	esignated by the cound I.	cil, the same body now w	vish to propose a	big development on wha	at is a greenfield site	which will dramaticall	y spoil the visual
Special Landscape Area is from the council own wording impact.	an area where "new d	evelopments should not	have an unaccept	table impact on special l	andscape areas" Th	nis development will ha	ave an unacceptable
Cowbridge has few amenities Its main appeal is the count	ry landscape which c	an easily be accessed th	e proposal will re	move the easy access b	y removing a much	used public footpath.	
The Thaw valley is currently unspoilt, development only b	eing to the fringes with	n little or no visual impact	compared to the	proposed development	which will destroy th	ne area.	
More houses mean more cars, with poor public transport cowbridge) and excess traffic on St athan road.	many occupiers will ha	ave multiple vehicles cau	sing pressure on	town car parking , the tra	affic lights on St Ath	an road (junction with	the main road into
The primary and secondry schools currently are at capaci	ty similarly the sewera	ge works 100 homes wil	I put excess press	sure on these.			
Overall the proposed development will ruin the character very questionable at best. The market will quickly raise the			ries', and the use	of "Affordable housing"	to overcome the pro	otection offered by Spe	ecial landscape Area is
3f - Please outline the changes you wish to see made to the D Have the candidate site removed and included as a green	•	, ,	erations.				
4b - If you wish to speak, please confirm which part of your rep	presentation you wish	to speak to the inspector	about and why th	ney consider it be neces	sary to speak at the	hearing -	

Representor ID and details: 4902/DP1 Mrs Rowan Young	g						
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform			pe consiered by 'written roon of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - No	does not not mee P2 - No	et one or more test(s) of	soundness, pleas	e indicate which test(s) t	hat it fails.
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 - N	No	
	Coherence and Effect	iveness Tests - CE1 -	No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(l:	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	? <u>New Policy:</u> No		New Paragraph: No	Amended Paragrap No	h: New Or Amen No	ded Site: Other (see No	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site? No	(If "Yes", pleas	se give the Candid	date Site Name and reference:	rence if known)
3e - Please set out your representation below: The proposal for new housing in Dinas Powys on the St C rush hour from the Merrie Harrier in Llandough all down C right out of Murch Road heading in the same direction. W doesn't seem to be any provision for this extra traffic.	ardiff Road to the Dina	is Powys infant School.	This means that a	at times you cannot pull	out of Millbrook R	oad left heading for Card	diff and you can't turn
Where are the children in this large development going to	go to school.? Both so	chools in the village are	nearly running at	capacity.			
Whilst I appreciate the need for new housing, a developm already stretched resources, and bring the roads to a grin	ent of this size in Dinading halt.	s Powys is not viable in	terms of the curre	ent infrastructure. It will t	be very detrimenta	Il to the current inhabitar	nts, put pressure on
3f - Please outline the changes you wish to see made to the D Remove the projected plan for new housing on the Dinas	Powys St Cyres School	ol site. Use the site for so					
4h - If you wish to speak please confirm which part of your rer		o sneak to the inspector				ne hearing -	

Representor ID and details: 4903/DP1 Debbie Williams					
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA	Rep format: Comment form	4a - do you want your comments you want to speak at a hearing se		
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound a Procedural Tests - P1 - Unanswere Consistency Tests - C1 - Unanswere Coherence and Effectiveness Tests - C	d P2 - Unanswer d C2 - Unanswer	red	lease indicate which test(s) 1 - Unanswered CE4 - Yes	that it fails.
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Parag 49	raph Number: Pro	oposal Map:	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "N	o" or "Unanswered" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: Unanswered Unanswered Notes:		Amended Paragraph: New Or An Unanswered Yes	mended Site: Other (see No Unanswered	otes):
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candid Site Name: Land off Sandy lane and land		(If "Yes", please give the Ca	andidate Site Name and refe Reference: MG2(35) MG2(,
3e - Please set out your representation below: We feel that Ystradowen has contributed more than most village and will overburden our local primary schools Y Bo There are many other NW rural vale villages that would be	nt Faen, Pendoylan and The Mountain So	chool already are oversub not necessitate the buildi	scribed. ing on greenfield sites.	he addition of 95 houses wi	Il negatively impact the
The sites proposed, especially the one MG2(36) is a mars	hy sites and so will require a large amoun	t invested to ensure the ru	un-off doesn't cause problems.		
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)				
4h - If you wish to speak please confirm which part of your ren	resentation you wish to speak to the inspe	ector about and why they	consider it be necessary to speak	at the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4904/DP1 Mr & Mrs Kerslak	e						
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform	, ,	our comments to be co at a hearing session of	,	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		nd does not not mee P2 - No	et one or more test(s) of	soundness, please ind	icate which test(s)	that it fails.
	Consistency Tests -	C1 - No	C2 - Yes	C3 - Yes	C4 - No		
	Coherence and Effect	tiveness Tests - CE	1 - No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	ıph Number:	Proposal Map:	Col	nstraints Map	Appendices:
	MG2(33)			MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Amended S	Site: Other (see No	otes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name: Land to t			(If "Yes", plea	ase give the Candidate Site Referenc		erence if known)
				y			

3e - Please set out your representation below:

We wish to strongly object to the proposed residential development to the east of St Nicholas, labelled MG2 (33) on the Draft Deposit Local Development Plan proposals map.

Our objection to the planning application 2010/01341/FUL (which is currently in abeyance) still stands, but as the site boundary of this candidate site is significantly larger; I feel that the effects felt upon this semi-rural village will be far greater than the 14 dwellings which were proposed under the previous planning application.

The Deposit Local Development Plan emphasises an overriding theme of sustainability throughout the document. It would be safe to assume that the candidate sites which have been included in the LDP should adhere to this policy objective and be sustainable. It is our impression, however, that the land to the east of St Nicholas would rely heavily upon private transport, not have sufficient access to services and would result in a large wedge of Greenfield land to be consumed.

The current bus route which serves the A48 from Porthcawl to Cardiff Central is overcrowded and expensive. There is no rail service which serves St Nicholas or the surrounding villages and to access a train station to travel further afield that Cardiff or Bridgend would involve a bus ride into the city centre which takes approximately 30 minutes as opposed to a 15 minute car journey.

There are no services which serve the village of St Nicholas. The nearest local shop is in the settlement of Bonvilston, in excess of 3.2km from the proposed site. In the opposite direction, the megastore of Tesco Extra is 2.7km away. Both of these shops are a completely unfeasible distance away and it is not practical for potential residents to catch a bus or walk to. This is indicated in the Census data relating to one car households in the area surrounding St Nicholas.

It can be seen that the majority of habitants in the areas surrounding St Nicholas have two cars per household followed by one car households. Only 43 dwellings in this area have no cars, out of a possible 468.

It is approximately 3.6km from the nearest doctor's surgery on Cowbridge Road, Ely, or 11.1km to Cowbridge Medical Centre, for which the catchment area of St Nicholas applies.

With regard to schools in the area, there is a small Church in Wales Primary in St Nicholas which has approximately 100 pupils on the roll. It is considered that a proposal to construct 50 dwellings may result in a 50% increase of the school's pupils, which is not feasible when taking the current size of the classrooms into account. Cowbridge Comprehensive is 10.5km away, and the nearest Welsh-Medium Secondary School of Ysgol Gyfun Bro Morgannwg is 9.4km from the site.

Previous Development Refusals

Due to the primarily linear settlement of St Nicholas, it is considered that any development which extends beyond the road would result in an unbalanced feel to the traditional village settlement and would set a precedence for development in the countryside. The site currently resides in a Special Landscape Area and a Conservation Area. We believe that the proposal for 50 mixed-density dwellings in this area would be much more detrimental to the area than previous planning applications which have been refused in recent years:

(ordered by Representation ID No.)

Representor ID and details: 4904/DP1 Mr & Mrs Kerslake

1990/01312/OUT & 1990/00167/OUT – 18 hole golf course 2008/1000/OUT – 3no residential dwellings 2010/01341/FUL – 14 no. Dwelling

90/01312/OUT: Character and appearance of St. Nicholas and the adjoining countryside would be adversely affected to an unacceptable extent; proposal would not preserve or enhance the character or appearance of the adjoining St. Nicholas Conservation Area.

St. Nicholas and Bonvilston Community Council were consulted on 30 July 2008 with regards to the above application and raised an objection on the grounds of development in the open countryside, the land being agricultural, the development being without agricultural or forestry influences.

Constraints

As you are aware, the site lies within a Special Landscape Area, and has a number of Tree Preservation Orders on the site. I believe that the proposal will detract from these specially protected areas which echoes previous refusals in the immediate vicinity such as 2008/01000/OUT and 90/01312/OUT which stated in the reasons for refusal that Character and appearance of St. Nicholas and the adjoining countryside would be adversely affected to an unacceptable extent; proposal would not preserve or enhance the character of appearance of the adjoining St. Nicholas Conservation Area.

Drainage and Water Pressure

I have concerns about the drainage and water mains on the site. As the village of St Nicholas is set topographically higher than the surrounding areas of The Downs and Bonvilston, the water pressure in the vicinity is already poor. The development comprising of 14 no. dwellings within an area where the water mains already suffer to cope with the number of dwellings on the A48 would have a further detrimental impact on this water pressure, leading to potential further problems which the dwellings along this highway already suffer.

Ecology

The above mentioned refusal for an outline planning approval for the erection of 3 no. Dwellings to the south of St Nicholas was refused on a number of ecology issues. There are great crested newts within the area which are likely to be impacted upon with such a large scale development within the countryside. This raises concern as the proposed large development of 50 dwellings on the subject agricultural land is likely to have a negative impact on the species which are probably present, as with the refused outline permission to the south of St Nicholas (rear of The Garth and Los Andes) in 2008 (application reference 2008/01000/OUT).

Settlement Boundaries and building line

The village of St Nicholas is characterised by a series of large detached dwellings which are located along the A48 at a series of regular intervals. The proposed development of 50 units including 35% affordable housing will disrupt the building line along the highway and will extend the settlement boundary further towards the east. This raised concern about potential urban sprawl which may occur and detracts from the landscape character of the village of St Nicholas.

Government planning policy in both England and Wales actively promotes redevelopment of brownfield sites. This is put across in Planning Policy Wales, the primary document for promoting sustainable development for the whole of Wales. It is predicted that the green field development on this large area of land would detract from the openness of the area and would remove a crucial character of the rural settlement of St Nicholas as defined in the LDP settlement hierarchy.

Planning Policy

The aim of this proposal is to create a minimum of 35% affordable housing for the current occupants of the village of St Nicholas and the wider area of the Vale of Glamorgan and Cardiff. It can be argued that there is already an amount of affordable housing in the areas of Church Row and Button Ride which were traditionally cottages and smaller dwellings for the workers of the Treharne Estate. There are also areas within the Vale of Glamorgan and Cardiff which have a large number of affordable housing developments which are suited to the people who they are designed for.

The village of St Nicholas does not have the amenities which could support such a development, particularly as there are no shops, no Post Office or other small businesses. Presumably the development hopes to create a sustainable community for those on a lower than average wage who may not be able to afford private vehicular transport. If the habitants were to walk to surrounding services they would need to walk either to the small shop in Bonvilston or almost two miles to Culverhouse Cross. This in my opinion is unfeasible, particularly as there is no pavement to the side of the highway on which the development is to be located. This conflicts with the guidance as stipulated in Planning Policy Wales section 8.1.1 which promotes sustainable developments which minimises the need to travel.

The land which is subject to this application is not included in the Joint Housing Land Availability Study 2009 which was prepared for the Vale of Glamorgan Council. This raises concerns that it has not previously been considered for potential development, and therefore the achievability of such a large development on a small site would not have been explored by the Council. It is obvious that as the study has not previously considered this land for the potential implementation of a housing development within the next five years, it is not in dire need in this area.

Sustainable development is a key planning consideration which is continuously referred to in Planning Policy Wales and the accompanying Technical Advice Notes. It is therefore of great importance that developments should comply with these policies. The proposed development to the east of St Nicholas is not sustainable in any shape or form and would be a serious conflict of such policy guidance if it were to

(ordered by Representation ID No.)

Representor ID and details: 4904/DP1 Mr & Mrs Kerslake

be approved. This stems from the scheme's proposed over development of a green field site, the reliance of the habitants on their own private motor transport and the potential social exclusion which is likely to occur if economically dependent people on the site cannot afford private transport and must travel an impractical distance to access basic amenities.

With regards to the Vale of Glamorgan Local Development Plan, the proposed 50 no. units conflicts with the policies included within it for the following reasons:

Development in the countryside

There is no justification to state why the proposed 50 units on the above mentioned site conflicts with Planning Policy Wales as well as the 10 objectives which are shown in the first few pages of the Local Development Plan. As these objectives are set out for all future development to adhere to, it is considered that the allocation of this land in the Local Development Plan is unsound. Furthermore, as the dwellings are simply stated to be 'social housing to assist local people wanting to return to the area' it is not considered by me as a resident that the clear conflict in policy has been reasonably defended.

The proposed development would clearly not be an improvement of the area, and would most likely be negative within the Special Landscape Area.

Agricultural Land

The proposed development will clearly be irreversible on an area of agricultural land which has for over two decades since we have lived in the area been used as grazing land. The so called overriding need which is stated in the application has not previously been considered in the village of St Nicholas which can be seen through the fact that it has not been included in the Land Availability Study, as mentioned above.

Special Landscape Area

The new development of such a high density is clearly out of keeping within the local area. There are no other dwellings of a similar nature within the vicinity as all of the surrounding properties along the A48 in St Nicholas are of a detached or semi detached nature and are all reasonably large. It is predicted by the local residents that the development would have a negative impact on the regular rhythm of spacing between the properties on this highway and would prove to be an eyesore within the Special Landscape Area.

Residential Development

The proposal would be out of keeping with the surrounding built environment and would have a detrimental impact on the existing building line and would construe a negative view on the street scene.

The scale and built form of the development is not suitable within this area. The proposal will create a dominant feature on a current area of undeveloped agricultural land. One of the attractive characters of this land is its openness and it is considered that 50 new units on a reasonably small site would result in overdevelopment and an unnecessary extension of the built confines of the village. The overdevelopment and extension of the village envelope could open a window of opportunity for urban sprawl to take place between the village of St Nicholas and Cardiff.

The proposal would result in an unnecessary amount of vehicular movements in and out of the site onto what is a major trunk road connecting Bridgend and Cowbridge with the capital city. The traffic generated by the site would endanger road users and pedestrians, as well as creating a significant amount of vehicular noise resulting from a site which currently experiences none.

The agricultural land on which the development is to be located is attractive and as mentioned above, used frequently for the grazing of sheep. It is considered that the loss of this green land would be detrimental to the visual amenity of the village of St Nicholas.

There are very few community facilities within the area that could support a development of this size. The residents would have to use their own cars to access basic amenities leading to a non-sustainable community. The scope for the provision of such facilities within a small village such as St Nicholas is not practicable. No investigation has been done to state whether the local primary school or secondary schools within the area would be able to cope with increased numbers of pupils resulting from this housing development.

One of the main aims of the Welsh Government is to reduce private car usage and consequently carbon emissions by 2020. It is considered that this site will have to allocate a large number of car parking spaces due to the unreliable and scarcity of buses running through the village. The buses cease to run on half hourly intervals at about 1800 every day, leaving workers who are employed outside of the core 9-5 hours in desperate need of personal transportation.

Residential Privacy and Space

The area is clearly defined by detached and semi detached dwellings which are set within a large amount of private amenity space. Very few properties are located close to their curtilage boundaries and there is a definite rhythm between dwellings. This proposal would result in overdevelopment of a small site which would be totally out of keeping with the surrounding area and therefore conflicting with the aforementioned policy.

(ordered by Representation ID No.)

Representor ID and details: 4904/DP1 Mr & Mrs Kerslake

Highways Issues

There are currently a number of driveways which access the main road of the A48. The road is restricted to 30mph but very few cars observe this speed limit, with many vehicles estimated to be exceeding this by up to 40mph on an hourly basis. A site of this size will result in a huge amount of additional cars resulting from the implementation of such a scheme. This would be a danger to the highway safety to current households along this main trunk road and other road users. Along with this there is the issue of another access opposite a number of private driveways where the occupants must reverse out from their dwellings onto the main road. There is the potential for vehicles entering and exiting the site coupled with the adjacent dwellings to be involved in a serious accident.

There is also an access track to the farm between the dwellings of Los Andes and The Garth on the opposite side of the A48. This is a narrow gap between a mature hedgerow and a stone wall which tractors with long trailers and other farm vehicles must negotiate on almost a daily basis. Due to the narrowness of the access track the agricultural vehicles often swing out a long way onto the A48.

It is for the reasons stated above that I strongly object to this proposed residential development and do not believe that there have been sufficient tests to establish the best locations across the district for residential development. We believe that the Vale of Glamorgan Local Development Plan is unsound and site 33 of policy MG2 should be deleted.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - It is for the reasons stated above that I strongly object to this proposed residential development and do not believe that there have been sufficient tests to establish the best locations across the district for residential development. We believe that the Vale of Glamorgan Local Development Plan is unsound and site 33 of policy MG2 should be deleted.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

Representor ID and details: 4905/DP1 Robert Samuel							
Date Lodged Status Petition and No. Supporting Evidence 28/03/2012 M 0	Additional SA SEA		Rep format: Eform	•	•	be consiered by 'writter sion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		I and does not not mee	et one or more test(s) o	f soundness, plea	se indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 -	Yes	
	Coherence and Effect	tiveness Tests -	CE1 - No	CE2 - No	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Para</u>	graph Number:	Proposal Map:		Constraints Map	Appendices:
	Objectives						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation? Ye	s (If "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	New Policy:	Amended Policy Yes	: New Paragraph: No	Amended Paragra No	ph: New Or Ame No	nded Site: Other (see I	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit Site Name:	the site as a Candi	date Site? No	(If "Yes", ple	J	lidate Site Name and rei	ference if known)

3e - Please set out your representation below:

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

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

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

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

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

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

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

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

Already the air pollution levels are excessive. The Nitrogen Dioxide [NO2] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide] and Particulates [PM10s] are not available and need clarifying.

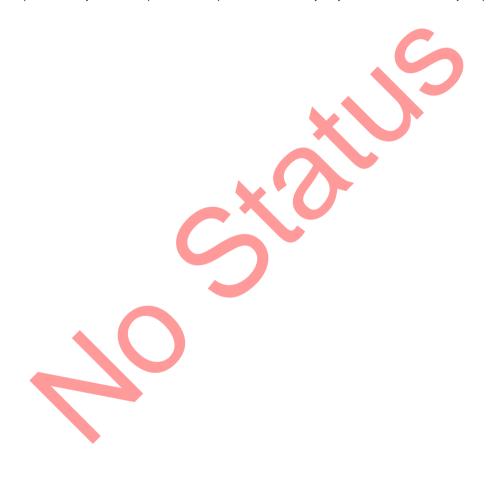
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic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

Representation ID No.)

Representor ID and details: 4905/DP1 Robert Samuel

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

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
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(ordered by Representation ID No.)

Representor ID and details: 4906/DP1 Susan Samuel							
Date Lodged Status Petition and No. Supporting Evider 01/04/2012 M 0	ce Additional SA SEA		Rep format: Eform			to be consiered by 'writte ssion of Public examinati	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -		nd does not not mee	et one or more test(s)	of soundness, ple	ease indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
	Coherence and Effect	ctiveness Tests - CE	1 - No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragra 	aph Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit P			(1)	f "No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Pla	an? <u>New Policy:</u> No	Amended Policy: Yes	New Paragraph: No	Amended Paragr No	aph: New Or Am	ended Site: Other (see No	Notes):
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				_			

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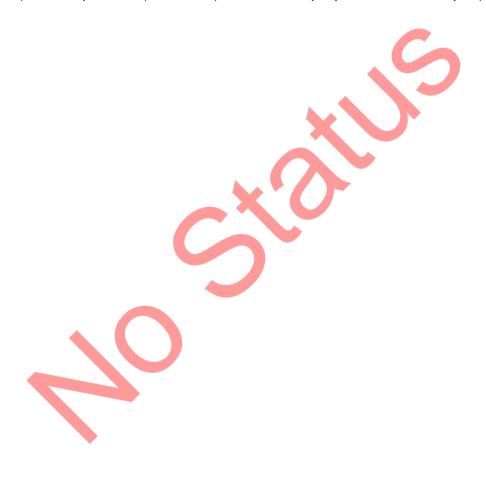
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Representor ID and details: 4906/DP1 Susan Samuel

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(ordered by Representation ID No.)

Representor ID and details: 4907/DP1 Catherine Samue	l						
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform			o be consiered by 'writter ssion of Public examinati	
•	2b - If you think that the Procedural Tests -		nd does not not mee	et one or more test(s) of	of soundness, ple	ase indicate which test(s) that it fails.
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							• • • •
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	Notes:						
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There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs, would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

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

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

Already the air pollution levels are excessive. The Nitrogen Dioxide [NO2] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM10s] are not available and need clarifying.

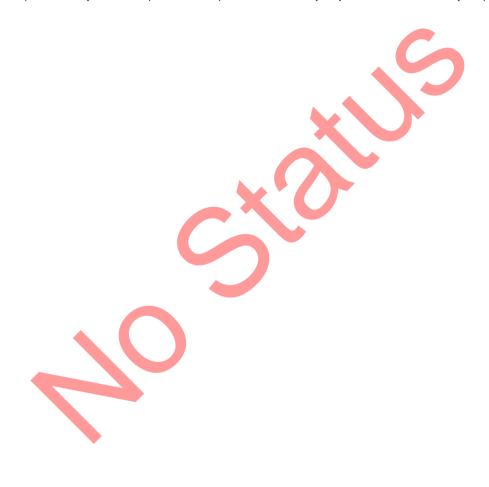
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic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

(ordered by Representation ID No.)

Representor ID and details: 4907/DP1 Catherine Samuel

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

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



Representor	ID and o	letails:	4908/D	P1 Darren John Bella	nmy						
Date Lodged 01/04/2012	Status M	Petiti	on and No. 0	Supporting Evidence	Additional SA SEA ✓		Rep format: Eform	,	,	to be consiered by 'writte ession of Public examinat	•
2a - Do you c	onsider t	he LDP	is Sound?	Unsound	2b - If you think that t Procedural Tests -		and does not not mee P2 - No	et one or more test(s)	of soundness, ple	ease indicate which test(s) that it fails.
					Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
					Coherence and Effec	tiveness Tests - C	E1 - No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?		Policy Number:	<u>Paragr</u>	raph Number:	Proposal Map:		Constraints Map	Appendices:			
		MG2(26)			MG2						
3b - Do you w	ish to se	e any cl	hanges ma	de to the Deposit Plan	as a result of your rep	oresentation? Yes	(If "No" or "Unanswere	d" - go to 3d)		
3c - What cha	inges wo	uld like	to see mad	de to the Deposit Plan?	New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	aph: New Or Am	nended Site: Other (see	Notes):
					No	No	No	No	Yes	No	
					Notes:						
3d - If your re	epresenta	ation rel	ates to a ne	ew, deleted or amende	ed site, did you submit Site Name: LAND To			` ` ·	ū	ndidate Site Name and re Reference: 2568/CS.1	ference if known)
3e - Please s	,			pelow: MENT BY HERBERT	R.THOMAS PLANNIN	NG CONSULTANTS		y			
		•	•	n to see made to the D MENT BY HERBERT	•	,					
4b - If you wi	sh to spe	eak, plea	ase confirm	which part of your rep	presentation you wish	to speak to the inspe	ector about and why t	they consider it be nec	essary to speak a	at the hearing -	

Representor ID and details: 4909/DP1 Daniel Brookman					
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA	Rep format: Eform			ed by 'written representations' or do ic examination? Written
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound at Procedural Tests - P1 - No	nd does not not meet o P2 - No	one or more test(s) of so	undness, please indicate	which test(s) that it fails.
	Consistency Tests - C1 - No	C2 - No	C3 - No	C4 - No	
	Coherence and Effectiveness Tests - CE			E3 - No CE	4 - No
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragra	nph Number: <u>F</u>	Proposal Map:	<u>Constrai</u>	
	MG2(25)		MG2		
3b - Do you wish to see any changes made to the Deposit Plar			No" or "Unanswered" - g	go to 3d)	
3c - What changes would like to see made to the Deposit Plan	? New Policy: Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):
	No No	No	No	Yes	No
	Notes:				
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candida Site Name: Swanbridge Road	te Site? Yes	(If "Yes", please	give the Candidate Site N Site Reference: M	lame and reference if known) G2 (25)
3e - Please set out your representation below: Sully has distinct settlement boundaries to the east of the being an important feature.	village, it is well known for it's rural feel and	the local farmland tha	at surronds the Eastern b	oundaries of the village w	vith it's agricultural farm buildings
An absence of sufficient public transport currently affects 1560 residents will result in a huge increase in traffic flow through Sully lanes. The Sully lanes were never designed already fragile roads.	for Sully residents. At present the egress ro	utes from Sully to Car	diff where a large % of re	esidents work, are either v	ria Lavernock Road, Penarth or
Sully is a village that has a population of over 4000 peopl the village. Sully also has a clear lack of leisure facilities to				dents. There is only one s	shop and a small post office to serve
Access to the proposed site can only realistically be achievehicles. The impact of plant any other commercial using	eved via the lanes (Swanbridge Road), the R this road will be very detrimental to the char	Road at Swanbridge ro racter of the roads and	ad is currently only a 'cood also the other road user	untry lane' with unsuitable 's.	access for wide and industrial
Environmental Impact- the proposed site at Swanbridge r problematic.	oad is currently used for agricultural purpose	es and it is believed th	at the land is grade 2 ag	ricultural land, therefore b	uilding on such land may be
3f - Please outline the changes you wish to see made to the D	. , ,				
I would like to see the proposed (reserve site) MG2 (25) r public transport links	emoved from the deposit plan due to the abo	ove reasons, and that	the Vale council look for	alternative sites within the	e Vale where there are more suitable
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspec	ctor about and why the	y consider it be necessal	ry to speak at the hearing	-

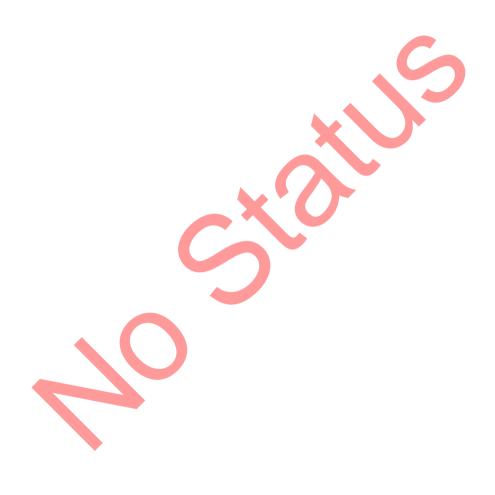
Representor ID and details: 4910/DP1 Mr & Mrs Richfield	I						_
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0			Rep format: Eform		at a hearing ses	be consiered by 'writter sion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - No P2 - No						
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect			CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:		oh Number:	Proposal Map:	•	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rop			If "No" or "Unanswered"	go to 3d\		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy: No	New Paragraph: No	No Amended Paragrapi	n: New Or Ame Yes	ended Site: Other (see No	Notes):
	Notes:						
	d site, did you submit Site Name:		e Site? No	(If "Yes", pleas	J	didate Site Name and ref	ference if known)
3e - Please set out your representation below: LDP Development in the St Athan Strategic Opportunity A	rea Key Settlement ar	nd Regeneration Area	paragraph 5.8 and	map.			
We think the proposals in the LDP (the Fields at Church F	arm behind the School	ol, St Athan, and at St	John's Well) to des	stroy open countryside fo	r new housing ir	St Athan are unsound.	
1.It runs contrary to established WAG and Vale Council popeople and wildlife for no clearly identifiable gain. Commo					ment. This will a	dversely affect environm	ent and amenity of both
The St Athan enterprise area seems to be the concept on buyers. Such speculative housing development has not be environmental damage.	which the proposed delped the Irish econom	evelopment is based. y, for example. The C	The Council shou Council should not	d ensure it brings busine allow such proposals to d	ss and jobs first develop moment	, to avoid houses being um all of their own, resu	built with no jobs and no lting in irreversible
2.Many would also urge caution in investment in an aeros	pace business park at	a time when the rest of	of the world seems	to be questioning the en	vironmental imp	act of flying.	
3. These two suggestions are outside the long established has been no significant inward investment at present with there are a number of houses in St Athan that have been presumably fewer people may wish to live in it.	resultant provision of j	obs in the area, (the E	interprise area is a	s yet a speculative conce	ept) so there is n	o housing need. Looking	g around the village,
4.The current transport system is full up. There is no more	road capacity, as any	one will know if they t	ravel on the roads	to Cardiff at peak times.			
5.To make a practical and positive suggestion, one thing t which has diminished further with the demise of the X45 w which trains usually reduce. The train currently passes wit houses in the village, so this is not an unprecedented suggestion.	hich no longer goes to hin easy walking dista	and from Cardiff. It is	s impractical to tra	vel from St Athan to Rho	ose and Llantwit	Major to catch the train	, as this involves driving,
We look to the Council to protect the Vale from speculative	e and unnecessary de	velopment like that pro	oposed at St Athar	to retain amenity for res	idents.		
3f - Please outline the changes you wish to see made to the De	eposit Plan to make it	sound (if relevant)					

(ordered by Representation ID No.)

Representor ID and details: 4910/DP1 Mr & Mrs Richfield

Suggest delete provision for housing at St Athan, Church Farm adjacent the Primary School, and delete housing at St John's Well, St Athan.

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



Representor ID and details: 4911/DP1 Mark Thompson							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			be consiered by 'written ion of Public examinatio	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	e Plan is unsound and P1 - Yes	does not not mee P2 - No	et one or more test(s) of	soundness, pleas	e indicate which test(s)	that it fails.
	Consistency Tests -	C1 - No		C3 - No			
	Coherence and Effective	veness Tests - CE1 -	No	CE2 - Yes	CE3 - No	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>		Proposal Map:		Constraints Map	Appendices:
	MG2(19)	5.63 - Trar	sport				
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Yes	(1	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Yes		New Paragraph: No	Amended Paragrap No		ded Site: Other (see N No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:		Site? No	(If "Yes", pleas	se give the Candi Site Ref	date Site Name and refeerence:	erence if known)
3e - Please set out your representation below:				,			
I wish to raise my concerns regarding the inevitable incressis already highlighted as a key problem (SEWTA REPOR will be funnelled through the A4055. The land development proposals in Sully, Penarth, Llandon	T). Contributing to the c	ongestion will be the 20	000 houses on Ba	arry Waterfront which ha	ve already been a	approved and resulting t	raffic heading to Cardiff
congestion at the Merrier Harrier Junction. Environmental	impact	e land adjacent to St 30	sepii s school su	illy road, together with th	ie new St Cyres S	cribol access will only a	ad to the existing
Already the air pollution levels are excessive. The Nitroge Assembly/DEFRA targets by no later than January 2015, pupils at Dinas Powys Infants School located on the A405	An increase in vehicles	are recorded as being 4 particularly standing tra	13.8 units on the A	A4055 where a maximur rbate the situation, which	m recommended h could have a se	level should be 40 units rious heath implication t	as EU law/Welsh o the 3 – 7 year old
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it s	ound (if relevant)					
In order to ease the situation on the A4055, I would like of pollution from the A4055. The existing buildings could be parking problems. The site could also house the Dinas Pothe matches and training are help on the Bryn Y Don field	improved to house the sowys Football club, whic	school.The site is also I h has no base and serv	arge enough to he	ouse the much needed I	Health Centre, ag	ain currently situated on	the A4055 with all of it's
Given some visionary thinking, this site could become an				ies problems without so		xisting ones.	
4b - If you wish to speak, please confirm which part of your repart of it, because the current infrastructure around our villa	oresentation you wish to	speak to the inspector	about and why th			he hearing -	

Representor ID and details: 4911/DP2 Mark Thompson								
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform	, ,		be consiered by 'writter sion of Public examinati	•	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	- If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. ocedural Tests - P1 - Yes P2 - No						
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 -	Yes		
	Coherence and Effect	veness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - Yes		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrapl</u>	<u>Number:</u>	Proposal Map:		Constraints Map	Appendices:	
	MG2(19)	7.81 - Tra	nsport					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(l	f "No" or "Unanswered"	- go to 3d)			
3c - What changes would like to see made to the Deposit Plan'	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	h: New Or Ame	nded Site: Other (see I	<u> </u>	
	Yes	No	No	No	Yes	No		
	Notes:							
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	he site as a Candidate	Site? No	(If "Yes", pleas	J	lidate Site Name and ref	ference if known)	
3e - Please set out your representation below:				y				
I note in the report that an assessment has been taken ar simply not enough rolling stock within the rail network, pa the Vale. I occasionally use the trains now, but find it diffic screaming to get off the train. With the extra 2000 houses to cope	rk and ride facilities, or cult to get on a train at	stations in all areas of rush hour, let alone get	the Vale to enable a seat. Last week	extensive use of public one lady had a panic a	transport to beco	ome a reality in address was so full and became	sing traffic congestion in every distressed,	
In addition bus routes would also be affected by traffic co	ngestion in all major ro	utes.						
3f - Please outline the changes you wish to see made to the D Removal of site for the purpose of developing further house. The site should be used to provide much needed Commu	sing.		of further overcrow	rding of public transport				
4b - If you wish to speak, please confirm which part of your rep The deposit plan does not include details of how public tra		•	•	•		ŭ		

Representor ID and details: 4911/DP3 Mark Thompson							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	•	- If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fa occdural Tests - P1 - Yes P2 - No					
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 -	Yes	
	Coherence and Effective	veness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	n Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(19)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Yes	(I	If "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? <u>New Policy:</u> No	Amended Policy: No	New Paragraph: No	Amended Paragra No	nph: New Or Ame Yes	nded Site: Other (see N	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	ne site as a Candidate	Site? No	(If "Yes", ple	ase give the Cand Site Re	idate Site Name and ref ference:	erence if known)
3e - Please set out your representation below:							
The LDP suggests that access to MG2 (19) site will be th other. The road is steep and bends sharply, which is avoi which adds to congestion.	rough Murch crescent w ded by all council vehicl	rith another possible ac es (Gritt <mark>ers, refuse lor</mark> r	ccess road being vies) when there is	Windyridge. This is a c s a falling of snow or ic	cul de sac that can e. Residents alrea	not presently fit two pass dy use the road to park	sing cars past each outside of their houses,
3f - Please outline the changes you wish to see made to the D Removal of Windyridge as a potential access road from the	•	ound (if relevant)					
4b - If you wish to speak, please confirm which part of your re		speak to the inspecto	r about and why the	hey consider it be nece	essary to speak at	the hearing -	

Representor ID and details: 4912/DP1 Gloria Surridge							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			to be consiered by 'writte ession of Public examinat	n representations' or do ion? Do not speak at he
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Procedural Tests -	ne Plan is unsound an P1 - No	d does not not me P2 - No	et one or more test(s)	of soundness, ple	ease indicate which test(s	that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
	Coherence and Effect	tiveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	oh Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	n as a result of your rep	resentation? No		(If "No" or "Unanswer	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plar	? New Policy: No	Amended Policy: No	New Paragraph: No	Amended Parag No	raph: New Or Am	nended Site: Other (see No	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name: Brynhill G		e Site? Yes	(If "Yes", p	ŭ	ndidate Site Name and re	ference if known)
3e - Please set out your representation below:							
I do not want to see any Green land used for buildings.							
It is such a wonderful area and we love walking and see	what nature has given u	ıs.					
Surely there are enough brown land sites that can be utili	sed.						
Also concerned about the road system and the increased	volume of traffic consi	dering the amount of s	schools in the area	1,			
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it s	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your re	presentation you wish to	o speak to the inspect	or about and why	thev consider it be ne	cessary to speak a	at the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4913/DP1 Persimmon and E	arratt Homes, c/o Agent -	Andrew Muir					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form		comments to be consideral comments to be consideral comments to be considerated as the considerated a	,	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered						
	Consistency Tests - C Coherence and Effectiven			ered C3 - Unanswer E2 - Yes C		ered CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph N</u>		roposal Map:	Constr	<u> </u>	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your represe	entation? Yes	(If "N	No" or "Unanswered" - g	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?		mended Policy: Ne es Ye	w Paragraph:		New Or Amended Site Unanswered	Other (see Notes Unanswered	:) <u>:</u>
3d - If your representation relates to a new, deleted or amende	d site, did you submit the s Site Name:	site as a Candidate Sit	e? Unanswered	(If "Yes", please	give the Candidate Site Site Reference:	Name and referen	ce if known)

3e - Please set out your representation below:

The dwelling requirement of 9950 dwellings is considered to be too low. The deposit LDP requirement derives from the Welsh Government's 2008 Based Local Authority Household Projections. However, Planning Policy Wales states that the household projections are the starting point for assessing housing requirements and it is also necessary to take into account local housing requirements (needs and demand) and the needs of the local and national economy. It also a requirement to have regard to relevant cross boundary issues and the emerging Cardiff LDP where there are significant travel-to-work and migration issues that have not been taken into account.

The Local Housing Market Assessment identifies an annual requirement of 915 affordable housing units per year which is far in excess of the 663 LDP annual requirement. Policy SP4 makes provision for 2624 affordable housing residential units over the plan period which is only 175 per year and on the basis of these figures the provision of affordable housing will not cater for identified housing needs which would indicate that the LDP requirement is too low.

In relation to the needs of the local and national economy Policy SP5 allocates 217 ha of employment land on three strategic sites in order "to ensure the continued prosperity of the Vale of Glamorgan and to promote growth in the capital region" and paragraph 5.46 states that the development of these sites are likely to generate an additional 12000-15000 new jobs within the economy of South East Wales. In addition 60.5 ha of employment land to meet local employment needs is also allocated.

The total allocation of employment land is therefore 277.5 ha which would require a take up rate of 18.5 ha over the plan period which compares with the annual take up of 4.1 ha over the 1996 to 2007 period. With such a large take tip of employment land and increasing job provision within the Vale of Glamorgan there must also be a compatible provision of housing land. Paragraph 4.6.4 of Planning Policy Wales states the following. "A broad balance between housing and employment opportunities should be promoted to minimise the need for long distance commuting."

The LDP does not provide this broad balance.

The LDP should also have regard to the emerging Cardiff LDP and the Population and Household Projections that have been undertaken by Edge Analytics. There is a strong inter-between Cardiff and the Vale of Glamorgan in relation to commuting and migration and the likelihood is that if the Vale of Glamorgan creates additional 12-15000 jobs then there will be an increase in net immigration into the Vale of Glamorgan. Insufficient consideration has been given to this matter.

The dwelling requirement of 9950 is based on the latest 2008 Welsh Government Household Projections which assume a net immigration of 500 per annum. The previous set of population and household projections which were 2006 based assumed a net immigration of 800 per annum and as a consequence the household projections were higher at 10,800 over the 2011 to 2026 period. Therefore on the basis that the Deposit LDP has substantially increased the employment requirement than that contained in the UDP and would require an increased level of take up at the very least it is more appropriate to assume that previous levels of net immigration will be achieved of 800 per annum rather than the 500 on which the dwelling requirement is based. This would increase the dwelling requirement to 11000 dwellings rather than the 9950 dwellings in the Deposit Plan which would also help to meet housing needs identified in the Local Housing Market Assessment.

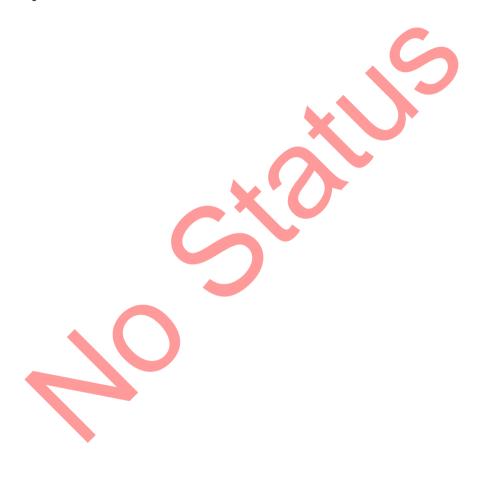
(ordered by Representation ID No.)

Representor ID and details: 4913/DP1 Persimmon and Barratt Homes, c/o Agent - Andrew Muir

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

The dwelling requirement should be increased to 11000 dwellings.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - This is a complex issue and needs to be subject to a hearing session.



Representor ID and details: 4913/DP2 Persimmon and E	Barratt Homes, c/o Agent - Andrew M	Muir			_
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA	Rep format: Comment for		our comments to be consiered by 'writter at a hearing session of Public examinati	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is uns Procedural Tests - P1 - Unar Consistency Tests - C1 - Unar Coherence and Effectiveness Test	nswered P2 - Unan nswered C2 - Unan s - CE1 - Yes	swered Swered C3 - Unansv CE2 - Yes	soundness, please indicate which test(s wered C4 - Unanswered CE3 - Unanswered CE4 - Unanswe	,
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation?	Yes (If "No" or "Unanswered"	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan?		<u> </u>	Amended Paragrap Unanswered	h: New Or Amended Site: Other (see I Unanswered Unanswered	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a G	Candidate Site? No	(If "Yes", pleas	se give the Candidate Site Name and re Site Reference:	ference if known)
3e - Please set out your representation below: There is objection to the omission of the Llysworney Bypa justification to the UDP policy states that the inclusion of to lorries use the B4270 which runs through the village of Lly Llandow. The Deposit LDP contains the UDP allocations for employ Llandow are important rural concentrations of employment employment at the Aerospace Business Park, St. Athan, and In considering the likely routes that will be used to access substandard road width through the village. The physical accident trend will not only continue but also increase as a lt is inconceivable to imagine that the existing strategic roareas allocated in the LDP. The Llysworney Bypass has be now than it ever has been and it is absolutely essential as There is therefore a requirement to provide the Llysworne	the scheme is important to relieve exworney as it provides an important and the Llandow Trading Estate at land but that they suffer from poor and 77.4 ha of land allocated for emore these sites it is probable that a significant as in the side of this route coupled with a result of extra traffic movements to ute through Llysworney is capable of the strategic highway networks by Bypass to ensure that the employ	e and the Vale Business Pa access and state that this i ployment at Cardiff Airport increasing traffic flows have and from the proposed but if safely accommodating the rent highway authority and rk to ensure safe and reliable	blems caused by a signifing to the A48 and onwards. rk. The BE Group Employs an issue which needs to and Port Road, Rhoose. ffic generated by the newner produced a cluster of a siness areas. e significant additional trapprevious highway authorities access for the allocated.	ificant number of heavy lorry movements rds to the M4 for businesses located on byment Land Study recognises that the trackling. In addition there are 88.5 ha of a businesses will choose to travel through accidents in the Llysworney village area. In affic movements that will be generated from the complex that will be generated from the demployment sites.	s through the village. The the industrial estates at wo industrial estates at land allocated for h Llysworney despite the It is inevitable that the om the employment the scheme is greater
SP7 and MG20 which would remain unchanged by the inc 3f - Please outline the changes you wish to see made to the D		vant)			
The Llysworney Bypass should be included in Policy SP7					
4b - If you wish to speak, please confirm which part of your report is important to attend the hearing due to the complexity		e inspector about and why t	hey consider it be neces	sary to speak at the hearing -	

Representor ID and details: 4913/DP3 Persimmon and B	arratt Homes, c/o Agent - Andrew Muir		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		nents to be consiered by 'written representations' or do ring session of Public examination? Examination
	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - L	oes not not meet one or more test(s) of soundne P2 - Unanswered C2 - Unanswered C3 - Unanswered Unanswered CE2 - Yes CE3 - U	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N 48	Number: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3	3d)
3c - What changes would like to see made to the Deposit Plan?			Or Amended Site: Other (see Notes): Iswered Unanswered
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Si Site Name:	ite? Unanswered (If "Yes", please give the	ne Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: Insufficient land has been identified to meet the dwelling r 7721 dwellings which includes 2 reserve sites for 995 dwe	equirement of 9950 dwellings. The LDP purports llings which will only be released where it is nec	s to include 10% flexibility by making land availal cessary to ensure an adequate supply of housing	ole for 10945 new dwellings yet only allocates land for land over the plan period.
There is an over reliance on windfalls which at 3049 dwell unacceptable level of uncertainty into the delivery of the L unidentified sites.			
In deriving the windfall allowance the Council has relied or built as they will only make a contribution to meeting the hadopted until April 2005. The figures are also distorted by discounting the average figure by 25% is insufficient and a	ousing requiremen <mark>t if</mark> they are completed. In ad he inclusion of a few large sites and the figures	dition for a large part of the ten year period there	was no adopted UDP in place as the UDP was not
3f - Please outline the changes you wish to see made to the Din order to ensure that the dwelling requirement will be me	t the average figure from windfalls should be dis	•	the windfall allowance would be 2033 rather than 3049.
In order to make up for the reduced windfall allowance lan			
4b - If you wish to speak, please confirm which part of your rep It is considered that this matter should be dealt with at the			peak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4913/DP4 Persimmon a	nd Barratt Homes, c/o Age	ent - Andrew Muir						
Date Lodged Status Petition and No. Supporting Evide 02/04/2012 M □ 0 □	nce Additional SA SEA		Rep format: Comment form	•	your comments to be con	•	•	
2a - Do you consider the LDP is Sound? Unsound	•	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered						
	Consistency Tests -	C1 - Unanswered	C2 - Unanswe	ered C3 - Unan	nswered C4 - Unans	wered		
	Coherence and Effec	ctiveness Tests - CE1	- Unanswered C	E2 - Yes	CE3 - Unanswered	CE4 - Yes		
3a - Which part of the Deposit Plan are you commenting or	? Policy Number:	Paragrap	oh Number: P	roposal Map:	Con	straints Map	Appendices:	
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3b - Do you wish to see any changes made to the Deposit I	Plan as a result of your rep	presentation? Yes	1" tl)	No" or "Unanswered	d" - go to 3d)			
3c - What changes would like to see made to the Deposit P	lan? New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	aph: New Or Amended S Yes	ite: Other (see N Unanswered	otes):	
	Notes:							
3d - If your representation relates to a new, deleted or ame	ended site, did you submit Site Name: Llandow		e Site? Yes	(If "Yes", ple	ease give the Candidate S Site Reference		erence if known)	

3e - Please set out your representation below:

Policy MG2 should be amended to include Llandow Newydd as a housing allocation.

Llandow Newydd is being promoted as a new settlement which includes the retention of the two industrial estates, the existing and expanded employment allocations and new housing and a village centre. The site area of the proposed new settlement is shown in red on the attached plan and the Proposals Map should be altered to include a settlement boundary around the site area. The total dwelling capacity of Llandow Newydd is 2750 dwellings including 825 affordable units and as the site would not come on stream until 2016 would contribute approximately 1800 dwellings over the LDP period (i.e. phase I 900 units and phase 2 for 900 units with the remaining 950 units (phase 3) being developed after 2026.A sustainability appraisal of Llandow Newydd is attached.

Proposals for a new settlement were first submitted in response to the deposit UDP and in his conclusions the UDP Inspector stated that "The Council accepts that the site is brownfield. I note that it has been developed in an unsatisfactory piecemeal way and consider it would undoubtedly benefit from a comprehensive comparatively long term planning scheme which would present a worthwhile challenge to ingenious planning design "The Inspector did not recommend the inclusion of the site but stated that "the redevelopment of Llandow airfield should be reviewed later in the Plan's life...." The Council did not include Llandow Newydd in the LDP because they consider it to be unsustainable but this viewpoint is not founded on a credible evidence base.

The site covers an area of 192 ha, the majority of which comprises the former Llandow Airfield which is situated approximately 3 miles south-west of Cowbridge and 1.5 miles north-west of Llantwit Major. The site lies adjacent to the B4270 which links the A48 at Pentre Meyrick to Llantwit Major. The site is bounded by the Vale of Glamorgan Passenger Railway Line to the west, the B4270 Llantwit Major Road to the east, Wick road to the south and Sutton Road and Sheepley Lane to the north.

Included within the site boundary are the two existing employment areas of the Llandow Trading Estate and the Vale Business Park both of which will be retained within the development. The site area also includes the two employment allocations at Llandow Trading Estate (6.8ha) and the Vale Business Park (12.4ha). The other existing uses on the site include the Llandow Race Circuit, the Llandow Caravan Park, areas of the former runway and former hangars. The remainder of the site is in use as agricultural land together with an area of woodland which lies between the railway line and the Llandow Trading Estate and will be retained within the development.

Llandow Newydd will be a sustainable mixed- use settlement developing and enhancing the existing employment areas and delivering the employment allocations within the Deposit LDP. This will be supported by a residential development of some 2750

dwellings of mixed density including 825 affordable housing units, a full range of services including 2 primary schools a village centre and, a park and ride scheme, a new passenger station, health and leisure facilities and significant areas of public open space including playing pitches. The proposals are set out on the attached master plan concept for the site.

One of the major benefits of the Llandow Newydd proposal is that it would fully fund the Llysworney Bypass including the provision of a new roundabout at Pentre Meyrick on the A48 and associated highway improvements along the B4268 which are long standing identified Council highway improvement schemes which are included in the UDP and will be required for LLandow Newydd to proceed. Unfortunately the

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Representor ID and details: 4913/DP4 Persimmon and Barratt Homes, c/o Agent - Andrew Muir

Llysworney Bypass is not included as a proposal in the LDP and a separate objection has been made to its omission.

Llandow Newydd is adjacent to the Vale of Glamorgan passenger railway line and the proposal includes for a station to be opened within the LDP period which will be required to encourage a greater use of public transport. A study was undertaken by Jacobs Consulting in January 2007 which established that it is possible to build a new rail halt to serve Llandow Newydd and that the timetable would allow existing train service to call at the station. The train station would not be provided at the beginning of the development. Initially a park and ride facility would be provided on site and land would be reserved for the station to ensure the station would be provided later in the lifetime of the development but during the LDP period. The exact timing of the provision of the station would be agreed with the Council and be subject to a requirement of a Section 106

Agreement.

The proposals would provide one English medium and one Welsh medium primary school on adjacent sites which would also provide shared facilities such as playing fields. The nearest secondary schools are at Llantwit Major and Cowbridge and contributions would be made to fund further rehabilitation and expansion to cater for the additional pupils from the development.

Agricultural Land Assessment

An agricultural land assessment was undertaken by Kernon Countryside Consultants (KCC) dated October 2006 and was submitted to the Council in 2008. This report concluded that of the site area of 179 hectares there would be a loss of 87 hectares of agricultural which they classified as 3b and below and concluded that none of the site falls into the best and most versatile agricultural land. The Council instructed Reading Agricultural Consultants (RAC) to verify the KCC survey and this report is dated 7th October 2008. The RAC verification survey only took six topsoil samples and in paragraph 4.4.10 the report states "To fully verify' these areas a full re-survey of the site it would be necessary, and therefore these figures should be treated as provisional." However, the document estimated that there is 5 1 hectares of grade 3a agricultural land.

Following receipt of the RAC document KCC produced a response to comments by RAC document which is dated 3S1t March 2009. A copy of this document is attached.

In preparing their response KCC undertook a further 38 sample points, 30 of which were subject to laboratory analysis. On the basis of the further survey work carried out by KCC in 2009 and accepting the use of height affects the Field Capacity Days which can affect ALC grade the up-dated survey found that about 12.7 ha or 7% of the site is Grade 3a good quality land, and that most of the agricultural land some 71.25 ha or 40% of the site remains of Grade 3b moderate quality land and 2.8 hectares grade 4 and 5.

Cultural Heritage

A cultural heritage assessment for the Llandow Newydd was undertaken by Cotswold Agricultural Trust Limited in November 2006. The assessment concluded that based on the evidence currently available there would not appear to be any overriding cultural heritage constraints to the development although the report does recommend further field investigation and a more detailed survey of the airfield to identify historic buildings/structures and a more detailed appraisal of their importance with reference to other Second World War airfields in Wales. A consultation response was also received from CADW who confirmed that there are no scheduled ancient monuments, historic parks and gardens or historic landscapes affected by Llandow Newydd and that CADW had no concerns to raise.

Ecology

In November 2006 an extended Phase 1 Habitat Survey of the proposed development area was undertaken by Wardell Armstrong which found no notable plants species recorded during the survey. The study found that the nature conservation of hedgerows, damp grassland, streams ponds and broadleaved woodland habitats within the survey area to be high, the majority of which are proposed to be retained within the development proposals

Transport

A transport assessment was undertaken by FMW Consultancy in February 2008 which concluded that there are no transportation reasons why the former Llandow Airfield should not be developed as a sustainable new settlement.

The site is located to the west of the B4270 Llantwit Major Road which provides the main north-south connection between Llantwit Major and Cowbridge and also forms part of the main link to the Vale coastal strip settlements of St. Athan, Rhoose and Barry from the west. To the north of the site the B4270 heads north-east towards Cowbridge and A48. The B4268 continues north through the village of Llysworney towards the A48 at Pentre Meyrick.

The B4268 is of a substandard width within the village of Llysworney and is subject to traffic calming measures in very narrow parts. Apart from this particular bottleneck the B4268/B4270 route provides two lanes of traffic in either direction and is acceptable as a rural distributor road.

The accident statistics for the period October 2001 to September 2006 illustrate that there were accident clusters at Pentre Meyrick junction in Llysworney village, the existing Vale Business Park access, the central access junction and at the Wick Road/Pleasant Road View Farm junction.

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A sustainable transport strategy is proposed; a new bus service will connect Llandow Newydd to Cowbridge and Llantwit Major with frequency of at least three buses per hour. The bus service will follow the B4270 from Cowbridge before circulating within

the site and then heading towards Llantwit Major on the B4270. The precise routing and location of stops will be determined at a more detailed stage but will include Cowbridge Town Centre, Llandow village centre and the residential areas, the proposed Park and Ride facility and Llantwit Major railway station. This will enable residents, employees and visitors alike to travel to, from and within Llandow Newydd by a more sustainable mode of transport than the private car.

The report undertaken by Jacobs Consultancy confirms that there are no technical reasons why a new station could not be provided to serve Llandow Newydd (copy enclosed). It is not intended that the new railway station would open at the commencement of the development, but at a point to be agreed with the Council which would be subject to a Section 106 Agreement.

Llandow Newydd will provide a comprehensive network of routes that will maximise the permeability of the site for pedestrians and cyclists. These facilities will be designed to accord with local and national guidance and will be formulated in conjunction with the highway authority. The village centre is within 1km of the housing and businesses proposed within Llandow Newydd.

The development will provide a range of local services and facilities that will minimise the need to travel beyond the site and the entire village will be readily accessible by sustainable modes of travel.

The Llandow Newydd development will fund identified highway improvement schemes in the UDP under Policy TRAN2 (these schemes have been omitted from the Deposit LDP and are subject to a separate objection). These works have been split into four phases as follows:

Phase I — Llysworney By Pass

Phase 2 — A48 Pentre Meyrick Junction improvement.

Phase 3 — B4270 widening between Nash Manor and Sheepley Lane.

Phase 4 — B4268 improvement between Pentre Meyrick and the Llysworney Bypass.

It is intended that these works will be phased to match the phasing of the housing development. Highway improvements Phase I and 2 would be provided within development Phase I by the first 900 units. Highway improvement Phase 3 would be provided during development Phase 2 i.e. 900 to 1800 units and highway improvement Phase 4 would be provided during development of Phase 3 i.e. 1800 to 2750 units.

In addition the developer is also prepared to fund the Cross Inn junction improvements on the B4270

Traffic surveys were undertaken by the Vale of Glamorgan in 2006 at seven junctions on the B4268/B4270 and the development traffic from the proposed site has been assigned to the local highway network using the base traffic turning proportions for both the morning and afternoon peak periods. The traffic assessment demonstrates that all of the proposed junction arrangements with the above improvements being brought forward will operate within capacity with an acceptable level of queuing delays with the proposed development in place. The assessment also shows that the surrounding road links will operate within capacity with the anticipated development and infrastructure phasing.

In addition all of the locations where accident clusters have been identified will be improved, downgraded or closed as a result of highways works being provided or funded as part of the development of Llandow Newydd.

Surface Water Drainage

Surface water drainage will be discharge in a number of ways; infiltration and on site reed beds out flowing from the site in the Sutton Brook. The Sutton Brook is sensitive to flooding and, as a main watercourse, attenuation measures will be required. A

sustainable urban drainage system (SUDS) will be adopted. Attenuation volumes will be reduced by designing infiltration features on areas where the geology is favourable. Approximately 75% can be drained in this way whilst the remainder will be serviced by a conventional pipe system through an attenuation pond.

Foul Sewers

There is discharge consent in place for an existing small sewerage treatment works (STW) on site but this is not suitable for treating the proposed development discharge. Options include the pumping of untreated sewerage to the Welsh Water Treatment Works at Llantwit Major which is 1.5 km away from the south-western boundary of the site or the provision of on-site treatment of foul sewage by private owned and maintained STW which is a viable proposition in a settlement of this scale. All other services including gas, telecommunications, electricity and water can be made available.

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Representor ID and details: 4913/DP4 Persimmon and Barratt Homes, c/o Agent - Andrew Muir

Employment Review

The proposals for Llandow Newydd include for the retention of the two industrial estates and the retention and expansion of the existing UDP/LDP employment allocations An Employment Land Review has been undertaken by Cooke and Arkwright (copy

enclosed) which found that the employment areas at Llandow are in a vulnerable and precarious state, the quality of services in the area are poor and the sites suffer from poor road infrastructure. The quality of the original airfield buildings in the form of the isolated hangars is poor and of limited life. The Trading Estate infrastructure is of especially poor quality and contains development in that is low grade and of predominantly bad neighbour use. The Vale Business Park has been incrementally

developed and whilst it is still being developed, its prospects are not helped by the servicing and infrastructure problems together with general perception of Llandow as a bottom tier industrial estate.

The findings of the BE Group Employment Land Study are similar. In the BE Study Llandow is recognised as an important rural concentration of employment land which meets the demand of local business from a wide catchment area which includes both

Cowbridge and Llantwit Major. However the survey results confirm the current problems of poor access to Llandow areas, the problems with the signage and the lack of even basic servicing to substantial parts of the Llandow employment area. Paragraph 10.11 of the study confirms that "The low quality nature of Llandow Industrial Estate requires tackling it needs betters road, utilities and higher specification premises "

As a consequence of the infrastructure problems, the low quality of the industrial environment and the fragmented nature of the development the long standing employment allocations are highly unlikely to be delivered in the LDP period, and particularly with the deletion of the Llysworney Bypass. The Llandow Newydd proposals will however deliver the infrastructure and highway improvements and contribute to generating demand for 28 hectares of additional employment land which has the potential for safeguarding or creating approximately 5000 jobs.

Conclusion

Llandow Newydd was considered by the Strategic Options Stakeholder Workshop (Report of Consultation June 2007) and para 2.5.8 states that 'At Llandow (including Llandow Trading Estate) as there is already an employment base which requires an

improved transport network (expansion to include housing development and associated services etc. would result in a sustainable community where there is already a demand for such improvements. The area also has a number of brownfield sites which could be developed, rather than utilising greenfield sites). Unfortunately these views were not taken into account when the Council considered Llandow as part of its strategic options assessment.

The proposals for Llandow Newydd would provide a sustainable community. It would provide a mixed-use development, using previously developed land with the vast majority of the agricultural land being of low quality. The provision of a train station and

improved bus provision would encourage greater use of public transport. The existing highway and infrastructure problems would be overcome and the provision of the Llysworney Bypass would be a major benefit to improving the western access route into the Vale of Glamorgan. The inclusion of the proposal in the LDP would therefore provide significant environmental, social and economic advantages and be in accord with Planning Policy Wales.

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

The land at Llandow Newydd should be allocated under Policy MG2 with a site area of 192 hectares and a total capacity of 2750 dwellings of which 1800 dwellings to be built in the LDP period. The Proposals Map should be amended to include the area on the attached plan as a new settlement.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - It is considered that this matter should be dealt with at a formal hearing due to the complexity of the issues involved.

(ordered by Representation ID No.)

Representor I	D and d	etails:	4915/DI	Mr Charles George	е									
Date Lodged	Status	Petitio	n and No.	Supporting Evidence	Additional SA SEA			Rep format:	4	4a - do you want y	our comments	o be consier	ed by 'written	representations' or do
13/03/2012	М		0	✓	✓			Comment for	rm ک	you want to speak at a hearing session of Public examination? Written				
2a - Do you co	onsider th	ne LDP	s Sound?		2b - If you think that the Procedural Tests -			does not not me P2 - Unar		` '	soundness, ple	ase indicate	which test(s)	that it fails.
					Consistency Tests -	C1 - Unan	swered	C2 - Unar	nswere	d C3 - Unans	wered C4	- Unanswere	ed	
					Coherence and Effect	tiveness Tests	- CE1	- Unanswered	CE2	- Unanswered	CE3 - Unansv	vered CE	4 - Yes	
aa - Which part of the Deposit Plan are you commenting on			ou commenting on?	Policy Number:	<u>1</u>	² aragrapł	n Number:	Prop	osal Map:		Constrai	ints Map	Appendices:	
					49	7	7.11							
3b - Do you wi	sh to see	e any ch	anges mad	de to the Deposit Plan	as a result of your rep	resentation?	Yes		(If "No"	or "Unanswered'	" - go to 3d)			
3c - What cha	nges wo	uld like t	o see mad	e to the Deposit Plan?	New Policy: Unanswered	Amended P Unanswered		New Paragraph: Unanswered		mended Paragrap Inanswered	h: New Or Am Yes	ended Site:	Other (see N Unanswered	
					Notes:					S				
3d - If your re	presenta	tion rela	ites to a ne	•	d site, did you submit t Site Name:	the site as a C	andidate	Site? No	>	(If "Yes", plea	•	ididate Site N eference:	Name and refe	erence if known)

3e - Please set out your representation below:

1.0 Introduction and Context

Herbert R Thomas LLP have been instructed by Lucy George to promote land at The Fruit Garden as an alternative site in the light of the recently published Draft Deposit Local Development Plan.

The site that is subject to this submission is currently a mixed agricultural and ice cream production business. It is proposed that the business use will remain to the east of the site, which is easily identifiable by the cluster of buildings to this corner. It is considered that the site is large enough to accommodate residential development alongside this family-run business with ease as the client does not wish for the business to be relocated from this site. The site subject to this submission would therefore be developed exclusively as residential use. The site area is approximately 6.082 acres (2.45 hectares) and is owned solely by our client.

The site is constrained to the north, south and west sides by residential properties, and to the east by open countryside. The parcel of land is well served by a highway and the main settlement of the village is close by. An access track to the east (as shown on the location plan) is owned by our client and is included as part of this submission. There is no overriding theme to the dwellings nearby with regard to size or style. It is considered that any development in an area such as Peterston should be carefully designed in order to respect the surroundings.

The proposed use of this site known as The Fruit Garden is to provide a parcel of residential land which will contribute to the housing allocation in the Vale of Glamorgan Council administrative area. At present in the Draft Deposit LDP, the spread of housing allocations across the Vale of Glamorgan is not evenly distributed with a large concentration being located in the south east area.

This representation proposes that the subject site is allocated as an alternative site consisting of residential use under Policy MG2.

2.0 Vale of Glamorgan LDP Vision and Objectives

The Deposit Draft LDP sets out in section 4 the objectives which it hopes to achieve across the duration of the plan period of 2011 – 2026. We believe that the proposed site at The Fruit Garden, Peterston meets these objectives in the following ways:

• Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all.

The site is located within an area which has not experienced any substantial growth for many years. There are some services in the village of Peterston such as two pubs, post office and small shop but as with many rural villages and settlements, these are declining rapidly as the resident population tend to commute unsustainably to supermarkets and services further afield. This site aims to address this common rural Vale problem by creating a new way of life whereby the use of sustainable travel methods is positively encouraged.

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It is considered that sustainable residential development such as this can help to revive traditional villages where the conventional village centre is declining by introducing a new generation of habitants who are not dependent on the private car to such a degree as their predecessors.

The site can be easily accessed from the village centre by foot or bike. The services available include two public houses, a village hall, school and shop which would all benefit from additional business/interest which a development like this would generate. The site would be constructed in a sustainable manner with renewable technologies being incorporated into the build wherever possible.

• Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change.

As mentioned above, the development will be constructed using the latest eco-technologies to ensure that it is as close to carbon neutral as it can achieve. The aspiration is to achieve a minimum Code for Sustainable Homes Level 4 on each of the dwellings when they are constructed. It may be the case, however that the cost of installing green technologies into domestic builds reduces significantly and in which case the aspiration will rise to achieve Level 5 for each of the dwellings. This is something which we predict will happen, particularly if the site is to be allocated for residential development in the second and/or third phase of development under the LDP.

The amount of green technologies which would be installed would have to be carefully thought about to ensure that first time buyers are not priced out of the market in this location, thus making the affordable housing element of the development unobtainable.

The site has been considered against the aims as set out in Planning Policy Wales Chapter 4 to mitigate the impacts climate change is having on Wales by taking a number of steps through the control of developments. These include living within environmental limits, ensuring a strong, healthy and just society, achieve a sustainable economy, promoting good governance and using sound science responsibly. As the majority of these aims are replicated in the Draft Deposit Plan guidance published by the Vale of Glamorgan Council, it is considered that these needs have been addressed by the proposed alternative site at The Fruit Garden.

• Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

This site encourages sustainable travel methods as the location is suitable for residents to walk or cycle to the village centre. This is likely to encourage future residents of Peterston to become less reliant on the private car, particularly when the cost of owning and running a motor vehicle is continually increasing.

A call and request bus service covers the times when public transport is not scheduled, by the individual calling the bus company at least 24 hours in advance to notify that they require picking up. It is considered that the day-to-day needs of residents could be catered for this way, in conjunction with the local shop which is located in the village.

We believe that during this plan period, planning policy can be used to change people's opinions on public transport. This is particularly relevant during times of economic hardship when people are trying to save money and cut back on extravagances wherever possible. By allowing single, or even no car households to be developed in this area, then this may encourage smaller businesses into rural areas and possibly revive traditional village and town centres.

Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment.

Much of the Vale of Glamorgan consists of small semi-rural settlements, such as Peterston, and vast amounts of open agricultural land. This proposal is for an infill development which would not result in a detrimental impact on the openness of the countryside. As the site is located onto a main carriageway and bound to two sides by residential land use, it is considered that the impact on the agricultural land is further reduced.

If the site were to be allocated as residential land, it is considered that the design and quality of the build materials would be of a very high standard. This would ensure that the development was in place for many years to come and did not compromise the balance between built and natural environment.

• Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan.

As mentioned under the 'objective 3', we strongly believe that residential development in semi-rural areas such as Peterston which push forward the idea of public transport and walking/cycling will encourage people to become less reliant on cars in the future. This site could provide accommodation for families as it is close to a primary school and shop, and an end result of a more diverse population spread would be for community facilities and services to relocate to the village to areas as the demand is now there.

Another alternative would be for the site to provide a smaller property for the ageing population of the United Kingdom to be able to downsize to. This would free up much needed housing stock, and because of the sustainable location would allow older generations to live and socialise in the same area.

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• Objective 6: To reinforce the vitality, viability and attractiveness of the Vale of Glamorgan's district, local and neighbourhood shopping centres.

The site is located within a very small neighbourhood where the only retail use nearby is a village shop/post office which currently serves the needs of the village. It is considered that the introduction of this sustainable site could encourage more traditional businesses to relocate to the area to provide the new residents with services. Additional feasible development reinforces the need for services such as a local shop and will prevent its closure in this area.

• Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs.

We do not believe that the current housing allocations (Policy MG2) will be sufficient to sustain growth for the whole 15 year period in which the plan is proposed to be in place. Smaller sites such as this have the potential to be put in place for development in the third phase of requirements.

This site in Peterston-Super-Ely would give people the opportunity to live in a semi-rural area whilst is providing the north of the Vale of Glamorgan with much needed additional housing stock. As there have been very few developments like this in excess of three or four units in recent years, the demand is understandably high.

In the current housing land allocation of the Deposit LDP, there is very little land to the north of the A48 which is allocated to deal with population growth and inward migration into the Vale of Glamorgan.

• Objective 8: To foster the development of a diverse and sustainable local economy that meets the needs of the Vale of Glamorgan and that of the wider South East Wales Region.

The Vale of Glamorgan is in need of dwellings across the county, but particularly in the rural villages which cover much of its administrative area.

The additional housing proposed here in Peterston-super-Ely would result in a new (albeit relatively small) influx of new people into the village and would encourage growth in all sectors, not just the residential. The Vale of Glamorgan Council needs to focus on growth not just in the south eastern corner of the administrative area, but the more important smaller settlements. The towns of Barry and Penarth are well connected by public transport to Cardiff and beyond: it is the smaller villages such as Peterston which require attention to ensure that they too are sustainable for years to come.

A sustainable local economy addresses the need for businesses and development of differing scales across the district which would cater for local need.

Objective 9: To create an attractive tourism destination with a positive image for the Vale of Glamorgan, encouraging sustainable development and quality facilities to enrich the experience for visitors and residents.

Peterston-Super-Ely is a very traditional British village which has rustic charm often sought after by tourists who wish to come and visit when in the area. This site will further assist this by portraying an image of a well established settlement with a new eco-friendly development which is sustainably looking into the future.

As this site will provide a sustainable settlement where residents can walk and use public transport, it is considered that this will be an attraction, particularly to visitors staying in the locality of Peterston who may not wish to travel far from their accommodation to access basic shops and services. This is particularly relevant if they are unfamiliar with the location in which they are staying.

Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources.

As this site would effectively be classed as an infill development between two existing residential properties, it is considered that this is an efficient use of the land and its surroundings which will not damage the openness of the countryside. The green nature of the site will mean that the latest renewable technologies will be used at the time of construction. This will ensure sustainability for many years to come, and effectively produce cheaper living costs for the habitants, particularly if grey water recycling, solar technologies and even biomass heaters are used.

3.0 Planning Policy Context

"In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes."

-Planning Policy Wales Edition 4 (February 2011). Chapter 4 Planning for Sustainability, 4.6.7.

It is considered that this proposed alternative site representation does adhere to this Planning Policy Wales chapter as the village centre of Peterston-Super-Ely is within close proximity and a number of services essential to rural village life can be found here. As well as walking, there is a bus link (V5 service) which runs between Peterston and Barry as well as Peterston to Cardiff. This service is once daily, but residents also have the option of requesting the bus to call via the village more frequently on a "divert a bus" service if they call in advance.

The development at The Fruit Garden would result in a small infill development which would also be deemed as acceptable under Planning Policy Wales 4 (Feb 2011):

(ordered by Representation ID No.)

Representor ID and details: 4915/DP1 Mr Charles George

"Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but building in the countryside away from existing settlements or areas allocated for development in development plans must be strictly controlled".

It is considered that the site could be used to allocate some affordable housing, which is much needed in the rural Vale of Glamorgan, as there is very little available in the village of Peterston.

The policy then goes on to state that the design and scale of the development must be appropriate, which is what our client hopes to achieve with this site if it were to be allocated in the LDP.

It is also stated in PPW that development is not normally allowed where the site is dependent on private transport to access services:

"In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes." Planning Policy Wales Edition 4 (February 2011). Chapter 4 Planning for Sustainability, 4.6.7.

It is considered that the site at The Fruit Garden has good accessibility by foot, bike and the public bus which can be requested for certain journeys outside of the scheduled services.

4.0 The Potential for Proposed Residential Development

This site would be a preferred option for residential development within the Vale of Glamorgan as it would provide accommodation in the much coveted village of Peterston-Super-Ely where house prices are relatively high. The proposal would not be for a vast development and would provide a sensible infill between the two adjacent properties. Housing density would be finalised if the opportunity arose to submit a formal application, but at present it is expected that possibly approximately 10 dwellings and associated works could be comfortably constructed on this site (a housing density of at least 5 units/ha). This would ensure that the development was in keeping with the surrounding properties and will not result in over development of the site.

No housing allocations are currently proposed for the village of Peterston-Super-Ely under the current Draft Deposit Plan, which is restrictive for the resident population whose families wish to remain in the area once they move out of the family home. Also people wishing to move into the area will currently be at a disadvantage in this exclusive village which does not cater for a wide range of prospective house purchasers at present.

The road links to the site are good, and the main village is close enough to allow habitants to walk to the centre for bus services, the shop and post office. It appears that the vehicular access to the site is sufficient for a residential development, but a specialist highways consultant would need to be formally consulted prior to a formal application being approved. The entrance to the site is likely to be located to the west of the site onto the highway.

5.0 Sustainability Appraisal

5.1 LDP Strategy

We believe that the above mentioned development will be a sustainable settlement as laid out in paragraph 5.10 of the Draft Deposit Plan. As demonstrated above, Peterston-Super-Ely is a considerable sized rural settlement which has a number of services and good transport links to the site. Very little development has taken place on the site in recent years, and it is considered that this site could provide a small site capable of boosting the status of the village and increase the desirability to live in this area. A particular draw to the area is the distance of the site from the village centre and the local primary school. The bus service also provides a link from the village to surrounding areas.

The site is not extensive, and therefore it is considered Peterston would be able to accommodate such a development without any detrimental impacts being felt on the existing shops and services which are located there. In fact, the implementation of such a site would have a positive impact on the local shop as more residents would be utilising the service, thus preventing its closure. If the land at The Fruit Garden were to be included in the LDP, it is considered that the profile of Peterston-Super-Ely would be raised by the prospect of new dwellings in the area. It will become an even more desirable place to live, particularly for young families and couples wishing to live outside of the main settlements of Barry, Penarth, Llantwit Major and Cowbridge.

5.2 LDP Settlement Hierarchy

Paragraph 5.11 outlines the growth strategy for the Vale of Glamorgan for the Local Development Plan period. It is stated that Peterston is a minor rural settlement, of which the special character of the rural Vale relies upon. The development at this site is not likely to detract from this special character, but will in fact enhance it through good design, encourage controlled growth in the area and provide additional housing stock for a wide range of people.

5.3 Detailed Site Appraisal

The main outline of the services and infrastructure which serves the site at The Fruit Garden is outlined in the paragraphs above. There is currently development on the site but as the definition of Planning Policy Wales, Edition 4 (2011) states that land used for agriculture or forestry does not constitute previously developed land, the site is still classed as greenfield. However, the site is not considered to be open countryside due to the small infill nature of the site.

(ordered by Representation ID No.)

Representor ID and details: 4915/DP1 Mr Charles George

As shown on the proposals map which accompanies the LDP Strategy text, Peterston is a flood risk area, but this site does not fall within that definition. The site is within a Conservation Area. It is considered that to eradicate any potential issues, the dwellings would be constructed using the highest quality materials and would be designed to reflect the style and size of existing properties in the area. A scheduled ancient monument is situated in the village itself, but it is considered to be a sufficient distance from the proposed development site. As mentioned above, there is no flood risk to any parts of the site.

The above table is taken from the Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000).

When assessing the site against these criteria, the nearest bus stop is classed as being acceptable as is 700m from the site (or 645m as the crow flies). The local primary school is 1100m away via the road (650m as the crow flies). As mentioned above, two public houses and village shop are also located in the village centre which also includes Peterston-Super-Ely Primary school. As these fit within the criteria as laid out in the above table, it is considered that the LDP test relating to site location and accessibility means that the site is deemed as being acceptable under these terms.

6.0 Summary

To finalise, we believe that this alternative site at the land known as "The Fruit Garden" is a preferred option to those which are shown in the current Draft Deposit Plan as it will provide a small number of dwellings in a coveted village. The development is a sensible one as it provides accommodation for people wishing to relocate to the village, but does not adversely affect the open countryside to such a degree as one which sits at the edge of an existing settlement. Infill developments are deemed as acceptable in Planning Policy Wales Chapter 4 (2011):

"Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but building in the countryside away from existing settlements or areas allocated for development in development plans must be strictly controlled".

The policy then goes on to state that the design and scale of the development must be appropriate, which is what out client hopes to achieve with this site if it were to be adopted.

Our client would ensure, through the planning application process that the quality of the housing would be high and the density of any dwellings would be stringently looked at if this site were to be included in the Local Development Plan.

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

Representor ID and details: 4916/DP1 Thomas Family T	rust, Marcross Holdings, LEL Properties, c/o	Agent - An	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		nents to be consiered by 'written representations' or doing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1	d does not not meet one or more test(s) of soundnes P2 - Unanswered C2 - Unanswered C3 - Unanswered -Yes CE2 - Yes CE3 - Utanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragrap 23. 120	h Number: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3d	d)
3c - What changes would like to see made to the Deposit Plan?		New Paragraph: Amended Paragraph: New C	Or Amended Site: Other (see Notes): swered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site Name:		e Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: There is objection to the omission of the Llysworney Bypa justification to the UDP policy states that the inclusion of t lorries use the B4270 which runs through the village of Lly Llandow. The Deposit LDP contains the UDP allocations for employ Llandow are important rural concentrations of employmen employment at the Aerospace Business Park, St. Athan, a ln considering the likely routes that will be used to access substandard road width through the village. The physical laccident trend will not only continue but also increase as a lt is inconceivable to imagine that the existing strategic roareas allocated in the LDP. The Llysworney Bypass has be now than it ever has been and it is absolutely essential as There is therefore a requirement to provide the Llysworne SP7 and MG20 which would remain unchanged by the inconceivable to imagine that the reverse and it is absolutely essential as	the scheme is important to relieve environment is sworney as it provides an important strategic rement at the Llandow Trading Estate and the t land but that they suffer from poor access a and 77.4 ha of land allocated for employment these sites it is probable that a significant primitations of this route coupled with increasing a result of extra traffic movements to and from the through Llysworney is capable of safely a leen a recognised priority by the current highly part of the strategic highway network to ensure that the employment strategusion of the Llysworney Bypass.	vale Business Park. The BE Group Employment La and state that this is an issue which needs tackling. It at Cardiff Airport and Port Road, Rhoose. Toportion of the traffic generated by the new business g traffic flows have produced a cluster of accidents in the proposed business areas. Commodating the significant additional traffic move way authority and previous highway authorities for mure safe and reliable access for the allocated employ	mber of heavy lorry movements through the village. The M4 for businesses located on the industrial estates at an addition there are 88.5 ha of land allocated for ses will choose to travel through Llysworney despite the in the Llysworney village area. It is inevitable that the ements that will be generated from the employment lany years. The importance of the scheme is greater yment sites.
3f - Please outline the changes you wish to see made to the D The Llysworney Bypass should be included in Policy SP7			
4b - If you wish to speak, please confirm which part of your rep It is important to attend the hearing due the complexity of	oresentation you wish to speak to the inspector	or about and why they consider it be necessary to sp	peak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4916/DP2 Thomas Family T	rust, Marcross Holdings	, LEL Properties, c/o Ag	gent - An				
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form		comments to be consient a hearing session of Pub		
•	•	e Plan is unsound and c P1 - Unanswered	does not not meet of P2 - Unanswe	ne or more test(s) of sou ered	indness, please indicate	which test(s) that it	ails.
	Consistency Tests -	C1 - Unanswered	C2 - Unanswe	ered C3 - Unanswer	ed C4 - Unanswer	ed	
	Coherence and Effective	veness Tests - CE1 -	Yes CI	E2 - Yes C	E3 - Unanswered Cl	E4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number: Pr	roposal Map:	Constra	ints Map App	endices:
	LDP Strategy	5.1					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Yes	(If "N	No" or "Unanswered" - g	o to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy: N	New Paragraph:	Amended Paragraph:	New Or Amended Site:	Other (see Notes):	
	Unanswered	Yes	Yes	Yes	Unanswered	Unanswered	
	Notes: 5.1-5.18 (LDF	Strategy)					
3d - If your representation relates to a new, deleted or amende	d site, did you submit the Site Name:	ne site as a Candidate S	Site? Unanswered	(If "Yes", please	give the Candidate Site I Site Reference:	Name and reference	if known)
3a - Please set out your representation below:							

There is objection to the LDP strategy which is set out in paragraph 5.3 of the Deposit Plan. The strategy which has been adopted is not realistic and appropriate having considered the relevant alternatives and is not founded on a robust and credible evidence base. This is due to the following reasons:

- 1. There is too large a concentration of housing allocations in Barry and the South East Zone (approximately 5400 dwellings or 70% of the allocations) where there are existing highway capacity problems. The Transport Assessment (TA) submitted in support of the Barry Waterfront development and endorsed by the Vale of Glamorgan identified that predicted traffic growth (without additional development) will exceed the capacity of 15 important highway junctions on the primary highway network in Barry and the South East Zone within the next 8 years. The TA also confirmed that some of the junctions were already at or near capacity and this is clearly evidenced by existing traffic congestion problems. It is important to note that the LDP acknowledges there is no realistic prospect of securing funding for the Dinas Powys Bypass within the plan period. This means the existing traffic congestion on the A4055 in Dinas Powys will inevitably intensify. If the highway network and the junctions referred above are examined in detail it is evident that the scope to engineer additional capacity is extremely limited. This fact appears to be passively accepted in the LDP by the lack of proposals to address existing and predicted future traffic congestion issues. It is therefore guite clear that even with substantial improvements to public transport the effect of allocating 5400 dwellings in Barry and the South East Zone will cause a dramatic escalation in traffic congestion. The highway network is either at or rapidly approaching capacity and is unable to accommodate the significant additional levels of traffic that that would be generated by the LDP proposals for residential allocation in Barry and the South East Zone.
- 2. The strategy is predominately a greenfield strategy contrary to Planning Policy Wales. If existing commitments are not included in the list of allocations in Policy MG2 then less than 10% of the allocated sites are on previously developed land.
- 3. The allocated sites in Policy MG2 will lead to an unacceptable loss of the best and most versatile agricultural contrary to Planning Policy Wales. The adopted strategy has led to the allocation of at least 76 hectares of grade 2/3a agricultural land quality, which is the best and most versatile. This in direct conflict with Planning Policy Wales which states in paragraph 4.9.1 "Land in Grade 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..........."
- 4.Two of the sites allocated (sites 15 and 16 for 795 dwellings in total) are on land designated as Undeveloped/Heritage Coast in the UDP. These allocations are contrary to the advice in Planning Policy Wales which states in paragraph 5.7.2 "Development plans should normally only propose coastal locations for development which needs to be on the coast. In particular the undeveloped coast will rarely be the most appropriate location for development."
- 5. There is an inherent contradiction in the settlement strategy and allocations with regard to the minor rural settlements. Policy MG7 permits development in minor rural settlements subject to criteria and the reasoned justification to the policy states in paragraph 7.34 that the new development "will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing." However the LDP contains some major allocations in the minor rural villages which cannot be considered infilling or limited small scale extensions. As such the allocations/strategy of the plan conflicts with soundness test CE1 which states that the "the plan does not set out a coherent strategy from which its policies and allocations logically flow".

(ordered by Representation ID No.)

Representor ID and details: 4916/DP2 Thomas Family Trust, Marcross Holdings, LEL Properties, c/o Agent - An

The Council should have adopted alternative strategy 8a which would have:-

- (i) reduced the amount of land allocated in the south east where there are highway capacity problems
- (ii) reduced the amount of allocations on greenfield sites and on high quality agricultural land
- (iii) make it unnecessary to make large allocations on the undeveloped coast
- (iv) major allocations in minor villages would have been avoided.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The LDP strategy as set out in paragraph 5.3 of the LDP should be amended to state:

"To promote development opportunities in Barry and the South-East Zone. The St. Athan area to be a key development opportunity and Cardiff Airport a focus for transport and employment investment. Other sustainable settlements including a new settlement at Llandow Newydd to accommodate further housing and associated development"

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - Owing to the complexity of the issues involved this matter should be dealt with by a formal hearing.



(ordered by Representation ID No.)

Representor ID and details: 4919/DP1 J Perry							
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examinati	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		nd does not not mee P2 - Yes	et one or more test(s) o	of soundness, plea	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 -	Yes	
	Coherence and Effect	tiveness Tests - CE	1 - No	CE2 - Yes	CE3 - No	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	nph Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(33)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation? Yes	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	P New Policy: Yes	Amended Policy: No	New Paragraph: No	Amended Paragra No	aph: New Or Ame Yes	ended Site: Other (see No	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candida	te Site? No	(If "Yes", ple	ŭ	didate Site Name and reference:	ference if known)
				7			

3e - Please set out your representation below:

Problems with the proposed MG2(33):

The site does NOT meet the objectives of the VoG LDP as set out in the Deposit Plan Written Statement

VoG LDP Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. This proposal does not provide opportunities for working or socialising and very limited opportunities for learning (at the small existing school) - and new (like existing) residents will find limited opportunities for these in and close to the village. There is no benefit for existing residents, and the new residents will be without many basic opportunities found elsewhere.

Objective 2: "To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change."

This site will increase car ownership and dependence and the numbers of necessary short car trips in the Vale. There will also be a need to pump water to the homes, through new pipes, further increasing the Vales carbon footprint.

Objective 3: "To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport." There is no employment or retail/shopping or leisure amenity in the village of St Nicholas or within easy/safe walking or cycling distance. There is only a limited bus service which connects residents to central Cardiff, Cowbridge and Bridgend, but not to many major places of local employment including Barry, Cardiff Bay, the Penarth Road area, the airport area, St Athan, etc

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment."

The proposed site is large enough to dominate the existing village, much of which has grown organically over many years. It will also end agriculture on a large area of grade 2 agricultural land.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan." There are no community facilities or services in St Nicholas, and most residents drive to Cardiff on the A48, so not supporting any facilities or services in the Vale. The plan does not propose the creation of any new facilities or services.

"Objective 6: To reinforce the vitality, viability and attractiveness of the Vale of Glamorgan's district, local and neighbourhood shopping centres. There are no shops in St. Nicholas and most residents shop in Cardiff... traveling by car."

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs."

The East Vale has a surplus of affordable housing at this time - and increasing oil prices are likely to dampen demand for all types of housing in rural St Nicholas in the future.

(ordered by Representation ID No.)

Representor ID and details: 4919/DP1 J Perry

"Objective 8: To foster the development of a diverse and sustainable local economy that meets the needs of the Vale of Glamorgan and that of the wider South East Wales Region." This is a proposal only for housing... no mixed use.

"Objective 9: To create an attractive tourism destination with a positive image for the Vale of Glamorgan, encouraging sustainable development and quality facilities to enrich the experience for visitors and residents."

N/A

Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. There is no evidence that this objective is met. Port Road has empty retail units that need redevelopment. This is a green field site, not brown field...

- Access From the A48 into the site and congestion at Culverhouse Cross. VoG council representatives have mentioned roundabouts and traffic lights but there seems to be no firm plan to get vehicles from the A48 to the site. In addition, Culverhouse Cross is already highly congested and no proposal to remedy this has been made. The proposed development would create many short car journeys, conflicting with the councils policies.
- Lack of Amenities St. Nicholas has a church, post box, telephone box and small school. St. Nicholas scored very poorly on amenities in the VoG's own sustainability report. There is no shop or pub and the school is already full. The village does not have the amenities to support such a development.
- Limited public transport and other alternatives to the private car. Infrequent bus service, making it almost impossible to have a Saturday or Sunday job without a car and a single ticket to Cardiff is currently £4.30. Residents would be car dependent, which is against council objectives.
- Affordability what is "affordable housing", and given St. Nicholas' position, are travel costs included? When travel costs are added, it seems unlikely that the site can offer "affordable" housing to those in need who are in employement.
- Demand/Need is there any need for this housing? There is currently a surplus of affordable housing in the East of the Vale according to VoG documents.
- The effects of the other proposed developments at Cowbridge, Culverhouse Cross (200 houses), Wenvoe and at Dyffryn Gardens on services, traffic and the environment. this proposed development only further adds to the problems at Culverhouse Cross.
- This development supports few local businesses.

On Port Road, there is a retail park that is mostly unused and ripe for redevelopment, but not included in this plan for redevelopment. The council is supposed to favour brown filed sites, over Grade 2 agricultural land for building. St Nicholas should be allowed to grow organically, and no large scale developments should be allowed - at least until amenities and access by means other than the car is significantly improved.

The VoG Sustainability Appraisal Report on the site records the following - results that will not be improved by this development:

++ (very positive) 1 + (positive) 1 0 (neutral) 8 - (NEGATIVE) 4 -- (Very NEGATIVE) 1

This is a very poor result for this site. 2 positives against 5 NEGATIVES.

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

The site does not meet the councils LDP vision (8.2 and 8.3) MG2(33) should be DELETED from the LDP as it does not meet the councils objectives, scores poorly on sustainability, and has no sustainable transport plan, in addition to the other issues with the site. The A48 is unsafe for cycling, few dare to cycle on it, and there are no plans for a segregated pathway, despite the need for children (non drivers) to access the school. Villagers, especially children and restricted to the village unless they have a private car, or can afford the cost, inconvenience and time of the limited bus service.

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

Representor ID and details: 4920/DP1 Mr Nick & Mrs Ha	zel Doherty			
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		your comments to be consiered by 'written re	
,	2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1	P2 - Unanswered C2 - Unanswered C3 - Unanswered		
, , ,	Policy Number: Paragraph MG2(19). MG2(20). MG2(11)	h Number: Proposal Map:	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unansv	wered (If "No" or "Unanswered	ı" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: Unanswered Unanswered Notes:	New Paragraph: Amended Paragra Unanswered Unanswered	ph: New Or Amended Site: Other (see Note Unanswered Unanswered	<u>es):</u>
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site Name:	Site? Unanswered (If "Yes", plea	ase give the Candidate Site Name and refere Site Reference:	ence if known)
3e - Please set out your representation below: We would like to raise two objections to planned developm. The first objection and concern is for the proposed housin themselves, we object if proper access is not built into the believe that if these new developments are built, then the be built or another access point to the Cardiff Road needs. Our second objection and concern is regarding the propos available. If that is removed, then people will be forced to elderly people who cannot walk that far. Basically, remove but also catastrophic for local trade. I know planning development must be a difficult task when plans in these sites is a lose-lose scenario for those who leads to the control of the c	g developments in Dinas Powys off Caerleon development. If no new access is built, then traffic situation will become a serious problem to be built. Seed removal of the Market Car Park in Cowbrid park along side the connecting roads leading all of the car park without building a replacement you have to consider everyone's viewpoint be	the only two exit points are Murch lights a for everyone concerend. Either a conne dge. There is already insufficient parking into Cowbridge which will prove hazardont fairly close by, will mean we will have the	and Bryn-yr-don which are already a problem cting road to the existing Sully lane behind S in Cowbridge and the Market car park is often us and very inconvenient, especially for my mostop visiting Cowbridge which will be very to the stop visiting	at peak times. We at Cyres School has to en the only parking nother and other disappointing for us
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)			
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspecto	or about and why they consider it be nece	ssary to speak at the hearing -	

(ordered by Representation ID No.)

Representor	ID and d	letails:	4921/D	P1 Charnwood Prope	erty Investments							
Date Lodged 02/04/2012	Status M	Petition	on and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Comment for	*	•		•	epresentations' or do ? Examination
2a - Do you consider the LDP is Sound? Unsound					Procedural Tests -	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered						
					Coherence and Effect	tiveness Tests -	CE1 - Unanswered	CE2 - Unanswered	CE3 - Unansv	wered CE	4 - Yes	
3a - Which pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:	<u>Pa</u>	ragraph Number:	Proposal Map:		Constrai	ints Map	Appendices:
					48. 49							
3b - Do you w	ish to se	e any cl	nanges ma	de to the Deposit Plan	as a result of your rep	resentation?	Yes (If "No" or "Unanswere	d" - go to 3d)			
3c - What cha	nges wo	uld like	to see mad	de to the Deposit Plan?	New Policy: Unanswered	Amended Poli Unanswered	cy: New Paragraph: Unanswered	Amended Paragra Unanswered	aph: New Or Am Yes		Other (see No Unanswered	tes):
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3d - If your re	presenta	ation rela	ates to a ne	ew, deleted or amende	ed site, did you submit Site Name:	the site as a Can	ndidate Site? No	(If "Yes", ple	ease give the Car Site F	ndidate Site N Reference:	Name and refer	ence if known)
0 51												

3e - Please set out your representation below:

The Proposed Development

It is considered that the proposed Alternative Site should be allocated in the LDP for resid<mark>ential development.</mark> Whilst this brownfield site already has a recent residential planning approval on the site, this representation proposes that that site can delivery a more efficient layout to accommodate up to 8 dwellings across the whole site. It is considered that the whole of the site can deliver up to eight new residential dwellings.

Policy 'fit' and compatibility

Stage one of the site assessment applied by the Council requires consideration of how the site is compatible with the LDP strategy and will assist in meeting the LDP.

The deposit LDP recognises that land is required to be made available for the provision of 9,950 new residential units in the LDP plan period (i.e. up to 2026). In order to meet this supply, proposed policy MG1 makes provision for 10,945 new dwellings. This figure includes a 10% margin for flexibility, and includes the potential for 866 units to come forward through small windfall sites during the plan period.

As outlined in the Population and Housing Projections Background Paper, the most recent Welsh Government 2008 projections indicate that there will be need for 10,034 new dwellings during the plan period, which is a 17% increase in households in the Vale of Glamorgan over the LDP period. These projections are calculated collaboratively by the Wales sub-national household projection working group, the Local Authority and key users.

The Council's proposed population figures have been adjusted slightly to reflect mid-year estimates issued by the Office of National Statistics (i.e. Option 1 outlined in the Population and Housing Projections Background Paper). Whilst experiences of other Local Authorities may indicate that the unadjusted Welsh Government projections ought to be applied in plan preparation (unless robust evidence is prepared to suggest otherwise), broadly, the proposed level of growth is supported.

In terms of spatial distribution of this growth, the Council have recognised that there is a need to ensure the provision of a range of choice of land for housing across the Vale. Whilst it is recognised that a large majority of this growth ought to be delivered on allocations at larger settlements, there is a need to realise an important proportion of this growth in smaller villages across the Vale.

The proposed Alternative Site is a rare opportunity in the rural Vale to sustainably deliver new rural housing on a brownfield site. Bearing in mind the size of City and the absence of settlement limits for the village, the allocation of the proposed Alternative Site would provide a key deliverable addition to the LDP.

Site Appraisal

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Representor ID and details: 4921/DP1 Charnwood Property Investments

Stage two of the site assessment applied by the Council requires consideration of the site in terms of its suitability and deliverability for redevelopment.

Site

The application site is located within the village of City, 0. 6 miles from Llansannor within the Vale of Glamorgan. The site is located in close proximity to a number of other villages and towns, including Ystradowen (2 miles to the east) and Cowbridge (approximately four miles to the south of the site).

The site is located on two distinct levels. The majority of the site, including the existing buildings is located on the southern, lower section of the site, whilst the northern section of the site, including the existing buildings is located on the southern, lower section of the site. parking is elevated at a higher level. The site is considered to be brownfield land (previously developed land) as defined in Planning Policy Wales (PPW) 2011, Figure 4.1.

The Alternative Site was in use as a public house until 2006, when the previous business was forced into administration. Since this point the building has been vacant, despite being placed on the open market for sale as a public house for a significant time.

The existing building is now derelict and in a state of disrepair. The site area is 0.18 ha, Access to the site is via the existing front and rear car parking areas from the minor unnamed road through City.

Previously the ground floor of the building provided a public bar, dining area, pool room, public toilets and kitchen. The first floor provided ancillary residential accommodation for use by the publican and family. The extensive accommodation previously comprised of four bedrooms, three bathrooms, lounge, dining room and kitchen.

The TAN 15 Development Advice Maps indicated that the site is not at risk of flooding.

There are no known ecological constraints on the site.

Surrounding Area and Accessibility

Coty is a village located in the Countryside. The village benefits from a community hall. City's close proximity to other villages and towns provide access to a wider range of shops and services. In particular, Ystradowen provides a garage (incorporating a shop), a pub, and village hall and bus services.

Buses run through the village of City providing access to the larger towns of Talbot Green and Bridgend

The site lies within the Upper Thaw Valley Special Landscape Area as designated within the UDP however, by virtue of the site's brownfield nature and potential for sensitive design in any event, this designation is not considered to be a constraint to development. Given the brownfield nature of the site, it is considered that visual impact on the rural setting will be minimal and mitigated by improved and sensitive design.

Planning History

The site benefits from an extant planning permission for residential development use of the site. Planning permission 2010/00118/FUL allows the conversion of the former public house to a single dwelling including external alterations. However, this is not considered to be the most efficient use of the site and there is potential for the site to delivery a greater number of new residential units.

Summary of Site Appraisal

This is a brownfield site which is unconstrained by environmental and physical factors. The redevelopment of the site, subject to sensitive design, is feasible and deliverable and could accommodate up to 8 new dwellings.

Sustainability Appraisal

Stage three of the site assessment applied by the Council relates to a Sustainability Appraisal (SA) of the site. The completed SA proforma is enclosed. In summary, the proposed Alternative Site offers an important and indeed unique opportunity to deliver sustainable rural growth on a brownfield site in the village. The brownfield site already benefits from extant planning permission for re-use for residential purposes and therefore this proposed allocation seeks the more efficient use of the site to deliver a larger number of dwellings. The potential for impact on visual amenity of the rural village can be addressed through sensitive design and landscaping. Moreover, there is an opportunity to use sustainable building measures in order to increase energy efficiency and carbon footprint of the proposed development.

Summary and Conclusions

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The above and enclosed commentary, appraisal and SA demonstrate that the Alternative Site provides a unique and important opportunity to deliver housing in the rural Vale. The Alternative Site is a brownfield site, is free from any significant environmental and physical constraints and has the potential to deliver a higher density of residential development than currently permitted on the site.

Accordingly, we would be grateful if you could consider this proposal to allocate the proposed Alternative Site in the emerging LDP and would welcome the opportunity to discuss this with a member of the Planning Team.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing MG2/proposed alternative site

(ordered by Representation ID No.)

Representor ID and details: 4922/DP1 Mr Robert P Harr	S					
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform	,		iered by 'written representations' or do ublic examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		does not not mee P2 - Yes	et one or more test(s) of	soundness, please indica	te which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 - Yes	
	Coherence and Effect	iveness Tests - CE1	- Yes	CE2 - No	CE3 - No	CE4 - No
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:	Const	raints Map Appendices:
	MG2(15)					••••
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(11	f "No" or "Unanswered"	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan	New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	h: New Or Amended Site	e: Other (see Notes):
	No	No	No	No	Yes	No
	Notes:					
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site? No	(If "Yes", pleas	se give the Candidate Site Site Reference:	e Name and reference if known)

3e - Please set out your representation below:

The proposal for the inclusion of site MG2 (15) into the local deposit plan raises a number of concerns and I would like to state my objection to it's inclusion in the plan for the reasons outlined below:

IMPACT ON EXISTING DEVELOPMENT:

- The current adopted UDP recognises that Llantwit Major has undergone significant development in the past and states that "Llantwit Major has accommodated a great deal of new housing development and therefore the UDP does not allocate any further land for residential use as it is considered that this would adversely affect the setting and character and would be contrary to the aims and objectives of Planning Policy Wales"(paragraph 4.1.5) It is clear that any housing development of the site MG2 (15) would have a detrimental effect on the character of the town through unacceptable intrusion into the rural landscape outside the current settlement boundary. This would be contrary to the adopted UDP which also states that "New housing outside the defined settlement boundary often creates unacceptable intrusions into the rural landscape." (paragraph 4.4.65). It is essential that Llantwit Major retains its character as a rural, coastal town and remains attractive not only to its residents but also to the numerous tourists that come to the area each year. Intrusion into the rural backdrop on the scale proposed by site MG2 (15) would only serve to have a negative impact in both cases. The LDP states of site MG2 (15) - "The Greenfield site is elevated and inland looking in parts, therefore development proposals will need to be sensitively designed" - This clearly alludes to the fact that any development would have a negative visual impact on the character of the town.

FUTURE DEVELOPMENT REQUIREMENT:

- The LDP states that there is a requirement for 9,950 dwellings within the plan period and that priority is to be given to Brownfield and Committed sites. The proposal of site MG2 (15) as a reserve housing site is therefore contrary and inconsistent with the council's strategy as it is a Greenfield site. Of greater concern is the fact that, since the site is proposed as 'reserve' site, this clearly suggests that the site should not be required to meet the housing requirement based on projections for the Vale of Glamorgan. It is therefore of great concern and does not follow logically that such a large development of 345 dwellings be proposed on a Greenfield site, when contingencies/reserves should be based on Brownfield sites, Committed Sites, Small sites and allocations currently within the adopted UDP. As it stands the proposal of Greenfield site MG2 (15) is contrary to National Planning Policy, clearly set out in Planning Policy Wales 2002 which emphasizes the importance of re-using Brownfield sites in order to minimise the use of Greenfield sites. As a result the site MG2 (15) should be deleted from the Deposit Local Plan.

IMPACTS ON LOCAL SERVICES/INFRASTRUCTURE:

- The current adopted UDP states that "New dwellings in the countryside can also place an unacceptable burden on local services" (paragraph 4.4.65). It is clear that the current services such as local dentists, doctors surgery and school services would come under increased pressure as a result of any development on the proposed site MG2 (15) and are barely adequate to deal with current demand. My youngest son attends the local Llanilltud Fawr Primary School which currently has two reception classes to cope with demand. It is of concern that an increase in pupil numbers would compromise the high standards currently achieved at the school. Of even greater concern is that we are aware of the closure of Eagleswell Primary School in the near future and also the fact that there has been a dramatic cut funding for the rebuild of Llantwit Major Comprehensive School following the dramatic overspend on Cowbridge and Penarth Schools. Clearly the development of site MG2 (15) has been proposed prematurely of any detailed study into the potential effects on these services.
- The current road system along Ham Lane is barely adequate to deal with current traffic flows particularly at peak times. At School opening/closing times Ham Lane is almost impassable and the current Heol Y

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Representor ID and details: 4922/DP1 Mr Robert P Harris

Felin/Lon od-nant roads are used as a Car park and roundabout for parents on the school run. Any development of the proposed site MG2 (15) with proposed access through Nant Yr Adar would further impact the road system here not only having a negative effect on the quality of life of the current residents but also impacting their safety and that of school children due to increased traffic flow in these areas. Once again further study is required of the potential impact here and as such site MG2(15) has been proposed prematurely.

- In general there is barely enough parking space in the town centre at peak times which would clearly be affected by development such as that proposed at site MG2(15). It would also place added pressure on leisure facilities within the town most notably a woefully inadequate Leisure Centre (when compared with other towns in the Vale of Glamorgan) and the current beach access which can become very congested at peak times and is already a cause of local concern.
- Also of concern is the issue of local employment, particularly for young people. With the scaling down of the DARA site at St. Athan and limited opportunities at the local Llandow Business Park area it is debatable whether Llantwit Major could sustain a development of the scale proposed at site MG2 (15) in terms of local employment opportunities.
- The extent of any physical constraints and impact on existing infrastructure such as water supply, drainage and sewer capabilities are also of great concern and require far more detailed assessment. Again this shows that site

MG2 (15) has been proposed prematurely and should be deleted from the deposit LDP.

ENVIRONMENTAL IMPACTS

- The LDP states of site MG2 (15) 'The site also bounds Hodnant Brook and partially lies within a C2 Flood Zone The Environment Agency have advised that a detailed flood consequence assessment will be required". It is clear that the existing communities of Heol Y Felin/Nant Yr Adar and Tennyson Way could be adversely affected by development on the site MG2(15) and that there are far too many unknown environmental impacts that could result from such development. A far more in depth environmental study is required to look at surface water runoff and potential flooding issues that could result from development. As a result site MG2 (15) has been proposed prematurely.
- The natural greenspace provided by the site MG2 (15) makes an important contribution to the quality of the environment and to the quality of life of the local communities as well as providing valuable and important areas for wildlife such as badger and bat species that have been seen by local residents. Any development of the proposed site MG2 (15) would clearly have a negative impact not only on the local natural landscape but also on local wildlife, potentially destroying the habitat of protected species. A full biodiversity assessment is required in order to assess the impact of development on this area.

GLAMORGAN HERITAGE COAST

- The Site MG2 (15) lies within a Landscape Character Area (LCA 7) which is a key background document which supports the deposit Local Plan. The proposal of site MG2 (15) for inclusion in the LDP is therefore contrary to the

Deposit Local Plan Supporting Documents Background Paper, which designates the site as Heritage Coast Hinterland (Landscape Character Area 7), as defined by the Vale of Glamorgan Designation of Special Landscape

Areas, Final Report, August 2008. This LCA designation also reflects the site's designation in the adopted UDP. As part of the Glamorgan Heritage Coast the area of site MG2 (15) should be preserved and enhanced. The Adopted UDP states that "the special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced and that the area will be treated as a remote zone with priority being given to agriculture, landscape and nature conservation." (Policy ENV5). It also states that "the designation of the Glamorgan Heritage Coast recognises it's national importance as an area of attractive undeveloped character of the coastline is conserved and to enable the provision of appropriate recreational facilities" (paragraph 3.4.15). the proposed allocation of site MG2 (15) is therefore contrary to the adopted policy ENV5 and as such should be deleted from the deposit Local Plan.

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

Deletion of site MG2 (15) - Land to the rear of Heol Y Felin/Nant Yr Adar, Llantwit Major - from the Plan.

Allocate site MG2 (15) as Glamorgan Heritage Coast.

Ammendment of the settlement boundary to the south of Llantwit Major to follow Heol Y Felin/Nant Yr Adar which continues to reflect the settlement boundary as defined in the adopted UDP.

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

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Representor ID and details: 4923/DP1 C&J Wood Sustain	inable Design Partnersh	nip						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	, ,	our comments to be at a hearing session	,	representations' or do on? Written	
2a - Do you consider the LDP is Sound? Sound	Procedural Tests -							
				wered C3 - Unans CE2 - Unanswered			red	
, , ,	Policy Number: MG2(34)	<u>Paragraph</u>	n Number:	Proposal Map:	_	Constraints Map	Appendices:	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? No	(If	"No" or "Unanswered"	" - go to 3d)			
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amender Unanswered	d Site: Other (see N Unanswered		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	ne site as a Candidate	Site? Unanswer	ed (If "Yes", plea	se give the Candidate Site Refere		erence if known)	
3a - Places set out your representation helow:								

Please see supporting representation attached:

Consultation Representation in support of LDP allocation of MG2(34) - Site on St. Bride's Road, WICK

An Appraisal for this site was submitted to the Council in December, 2010, under the Candidate Site selection process (No. 2446/CS3).

The village of Wick already has an important role as a hub for the wider rural community of this area, meeting many educational, social and economic needs. Sustainable holistic residential development of this substantial and well located village site is seen as a means to benefit and strengthen the local community. It would improve the socioeconomic sustainability of Wick and of the wider meta-community of this part of the Vale of Glamorgan.

Support for Wick Village Services and Institutions - (satisfying Objectives 1, 5, 6, 7, 8, 10 of the Deposit LDP)

Many aspects of village life are operating below optimum and would benefit from increase in critical mass through a balanced increase in the village population:

- Wick and Marcross Primary School currently approximately 20 vacancies expected in September, 2012 (under the current Council allocation for the school).
- Playgroup currently at capacity due to space restrictions (the developer contribution could possibly include either improved facilities or additional new facilities within the development as part of the contribution to village amenity and sustainability)
- Village shop and Post Office closed for part of 2011 and re-opened with reduced floor space at present. Likely to be at continued risk and would benefit from additional customers.
- Pubs originally Wick was able to support 6 pubs. Of the last two remaining, The Star Inn has now closed and is up for sale. Only the Lamb and Flag remains.
- The local garage closed a number of years ago.
- Village clubs, societies and extra mural education classes would all benefit from increased membership; these include bowling, pilates, young farmers, toddlers group, brownies, guides, art classes, rugby and cricket
- Religious provision St. James Church and Chapels would be strengthened by increased membership

Additional Accommodation - (satisfying LDP Objectives 1 and 4) - development of the site would be an opportunity to provide sustainable housing for local and incoming residents as follows:

- Designed to Lifetime Homes. Welsh Housing Design Quality Standards, RNIB etc.
- A range of sizes and types of accommodation to cater for all categories of people young independent, families, elderly at home, disabled

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Representor ID and details: 4923/DP1 C&J Wood Sustainable Design Partnership

Varied tenure to suit all needs

Resilient Development - (satisfying LDP Objective 2) – based in a village which has well confirmed views on sustainability, this site is ideal for resilient development designed to mitigate and adapt to climate change using current technologies and energy efficient design principles as follows:

- CSH 5-6 and Design to Passive House criteria
- Super insulation
- Zero carbon operation
- Zero carbon construction
- Micro-generation
- MVHR
- Water harvesting and conservation plus SuDS

Sustainable Location and Transportation - (satisfying LDP Objective 3)

- The location of the site lends itself to design to Welsh Transport Hierarchy priority to pedestrians, cyclists, mobility. Residential development of the site would support the Personalised Travel Planning initiative (PTP), 2011.
- The site is within very close walking distance of all village facilities
- Increased population would improve the take-up and economic viability of local transport. There is a bus stop close to the site. There is general agreement in the village that bus services are inadequate and frequencies need to improve.
- Development of the site should not adversely affect vehicle movement within the village and with good traffic planning should also serve to reduce speeding concerns on St. Bride's Road.
- Adequate numbers to support a Car club initiative which would benefit the whole community
- Electric car charging points would be included as a future proofing measure

Public Realm and Landscape Contribution - (satisfying Objective 4)

- The site is already well integrated spatially within the natural village envelope. Development would round off and strengthen the heart of the village.
- The long boundary with the St. Bride's Road provides an opportunity for high quality public realm with an active frontage and diffusion routes through the site. This could include a footpath access onto Heol Faen. The size and configuration of the site would support a socially functional layout, with seating, home squares and vehicle free areas. This would encourage social interaction, increase daytime activity on the site and automatically provide natural surveillance.
- The size of the site and its proximity to the rural landscape would provide easy landscape integration through softening of the site margins with tree planting, hedging and ecological set aside.

Social and Economic Benefit to the Community - (satisfying LDP Objectives 8, 6 and 10)

- There is sufficient area on the site for an allotment scheme (which could be run through a village allotment society) and this may encourage other allotment sites elsewhere within the village and the Vale at large.
- Small low impact work units within the site would support local enterprise within walking distance of the village
- There would be the potential for an educational resource for the local school on sustainable living
- Holistic development of the site would support local 'green' trades with an exciting sustainable construction project
- Design will conform to the principle of local sourcing and supply of natural and local materials (meeting SPG Design in the Landscape) in response to perceived local preferences
- The development of this site would be able to support BT's high speed Broadband Network already pioneered in the village.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4923/DP2 C&J Wood Susta	inable Design Partners	ship						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		Rep format: Eform	, ,	our comments to be co at a hearing session o	•	•	
2a - Do you consider the LDP is Sound? Sound	Procedural Tests -	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered						
				swered C3 - Unans CE2 - Unanswered			red	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(13)	Paragrap 	h Number:	Proposal Map:	_	nstraints Map	Appendices:	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	If "No" or "Unanswered"	" - go to 3d)			
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended Yes	Site: Other (see N Unanswered		
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20 Diagon and out your representation below:								

3e - Please set out your representation below:

Please see attached PDFs:1. Consultation Response - Proposal to include an additional parcel of land into MG2(13):

Consultation Response – Proposal to include an additional parcel of land into MG2(13)

It is felt that the existing LDP allocation for MG2(13) which combines 2446/CS1 with a portion of 2446/CS2 creates a bottleneck which will act as a constraint to effective development of the combined sites. The inclusion of the proposed additional parcel of land into MG2(13), as shown in the attached

Fig. 1, Site Plan, is believed to provide the following benefits:

- 1. Logical rounding off of the Settlement Boundary which would correspond with the LDP routing of the Settlement Boundary through CS2. (See separate representation)
- 2. Amenity and Community benefits:
- 2.1. Extra space for realignment of St. Athan Road hairpin bend (see attached schematic drawing, Fig. 3) and effective configuration of road access to the two halves of MG2(13) on either side of the St. Athan Road.
- 2.2. Extra space to design a safe crossing for Public Rights of Way (PRW) over \$t\$. Athan Road, (e.g. via a footbridge which makes effective use of the contours of the land, or other safe crossing). Footpath L4/58/1 (Windmill Lane) would then be re-routed to avoid unprotected stretches of highway (Fig. 2) and be safely linked via courtesy paths to:
- o St Athan Road existing tarmac footpath into town
- o The proposed Aberthaw/Cowbridge cycleway along the disused railway track along NE boundary of Tom Thomas' land
- o The footpaths L4/42/1 & L4/59/3.
- 3. Facilitate better residential and community masterplanning layout and design, and allow:
- 3.1. Removal of the design bottleneck at the east corner of CS1 which exists under the present LDP proposal for MG2(13)
- 3.2. Additional space for vehicle, cycle, mobility & pedestrian access to development areas either side of the St. Athan Road, which will otherwise bisect the development.
- 3.3. Better use of landform and contours for access roads
- 3.4. Improved spatial layout for housing (e.g. improved access and reduced overlooking)
- 3.5. Optimising of housing densities

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Representor ID and details: 4923/DP2 C&J Wood Sustainable Design Partnership

- 3.6. Improved scope for screening and landscaping to integrate the development with the adjacent Special Landscape Area (SLA).
- 4. An increase in developable land area which would augment the number of residential and other units. This should:
- 4.1. Compensate for the slightly reduced overall site housing density necessary for the extra public open and amenity space, footpaths and landscaping needed to create a sustainable development on this site/ It would maintain the LDP target figure of 100 units
- 4.2. Help meet identified housing need in this strategic Service Centre Settlement
- o Cowbridge would benefit from additional population to support its local commercial, retail centres and amenity facilities
- o There is existing and un-satisfied high demand for all categories of homes family, young people moving to independence, independent elderly, and independent disabled whether owner occupied, rental or affordable
- 4.3. Improved financial viability for developers who will have to be prepared to build to a high standard of energy efficiency and renewables
- 5. Environmental Benefits:

The inclusion of this parcel of land would bring on board the owner of the lands between MG2(13) and the River Thaw. He has expressed a strong commitment to the environmental programme suggested in the Appraisal 02.11.10 and wishes to contribute to the environmental success of the overall proposal for MG2(13).

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

Proposed additional parcel of land on the Southern border of MG2(13)

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

(ordered by Representation ID No.)

Representor ID and details: 4923/DP3 C&J Wood Susta	inable Design Partners	hip						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	,	your comments to be cor cat a hearing session of	•	•	
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3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If "No" or "Unanswered	l" - go to 3d)			
3c - What changes would like to see made to the Deposit Plan	New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amended S Unanswered	Site: Other (see N Yes	otes):	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	e Site? No	(If "Yes", plea	ase give the Candidate S Site Reference		erence if known)	

3e - Please set out your representation below:

In respect of the phasing of MG2(13) (LDP Written Statement p.128): notwithstanding that this is a greenfield site and is therefore automatically phased to 2021-2026, it is proposed that phasing of the completion of development on MG2(13) should be brought forward to the 2016-2021 phase or sooner for the following principle reasons:

- 1. The community benefit to be derived from re-configuration of the St. Athan Road
- 2. Sweeping improvements to footpath connections including a footbridge
- 3. The undoubted advantages which would result from bringing forward an exemplary sustainable development of zero carbon housing.

(This is outlined in more detail in the attached PDF):

VoG Deposit LDP Public Consultation 20.02.12 – 02.04.12; COWBRIDGE MG2(13) PHASING: reasons to bring phasing of construction forward to, say, the middle tranche (2016- 2021).

Although green field sites are automatically allocated to the latter phases of the Plan, in order to prioritise brown field sites (LDP 8.4), there are good reasons, based on the Written Statement criteria, for bringing MG2(13) forward during the Plan period to 2016-2021 (in general accordance with LDP 8.5):

- 1. Funding will be available to develop masterplan/site studies/outline planning, as well as development (thereby meeting the criterion of para 8.3 the LDP, bullet point 2)
- 2. There would be local social advantages to Cowbridge of early phasing (thereby meeting LDP criterion 8.2 which states: "The phasing of sites aims to reflect local circumstances...").

Earlier phasing of MG2(13) would bring forward the following:

- 2.1. Improvement to hairpin bend on the strategic St. Athan Road (This would also allow LDP para 8.5 to be satisfied with regard to site infrastructure)
- 2.2. Significant improvement to functionality and safety local Public Rights of Way network, with connection of footpath route L4/58/1 across St. Athan Road & link to footpath routes L4/42/1 & L4/59/3.
- 2.3. Provision of community facilities allotments, recreational and open space
- 2.4. Meet identified need (JHLS) for private and 'affordable' housing for: families, young people moving to independence, and the elderly living in the community (as proposed on pp 4-5 of the Appraisal document 02.11.10 previously submitted to the Council, and conforming to LDP para 8.2 to "...ensure that a range and choice of sites are available...".

NB: At present, the LDP Phase 1 allocation for Cowbridge comprises 87 units from 3 sites at a density of 40/ha. This may not be achievable when the space constraints of, e.g. archaeology, public open space, access and infrastructure are taken into account. Furthermore, the town centre locations and site constraints make it likely that a high proportion of these units will be flatted developments, leaving a shortfall

(ordered by Representation ID No.)

Representor ID and details: 4923/DP3 C&J Wood Sustainable Design Partnership

particularly of family units.

- 2.5. Provision of small work units.
- 3. General benefit to the rural meta-community, the Vale of Glamorgan as a local authority and to Wales as a whole: Early phasing would:
- 3.1. Strengthen the role and functionality of Cowbridge as a Service Centre Settlement in the Vale. The additional population would help maintain the viability of Cowbridge's services, and help repay the planned expansion and investment in the town's retail and commercial sectors as proposed under the Plan
- 3.2. Support this Zero carbon exemplar, which would meet Local Authority and Assembly Government objectives and stimulate the government's exemplar/demonstration programme
- 3.3. Provide a significant boost to the local and regional green economy and help put the VoG and Wales in the forefront of a sustainable construction and sustainable service industry sector.
- 3.4. Cowbridge is a high profile, attractive and sought after location. It therefore meets the necessary criterion of sufficiently high end values which are currently necessary support the additional development costs of the sustainable exemplar development of MG2(13).
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

 Re-phasing of MG2(13) as set out in Part 3e above.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



Representor ID and details: 4923/DP4 C&J Wood Susta	inable Design Partnership			
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		your comments to be consiered by 'written representations' or do at a hearing session of Public examination? Written	
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of P2 - Unanswered	soundness, please indicate which test(s) that it fails.	
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unans	swered C4 - Unanswered	-
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Unanswered	CE3 - Unanswered CE4 - Unanswered	-
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:	
	Delivery and Implementation			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered	" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan		ew Paragraph: Amended Paragrap Inanswered Unanswered	oh: New Or Amended Site: Other (see Notes): Unanswered Yes	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Si Site Name:	te? Unanswered (If "Yes", plea	ase give the Candidate Site Name and reference if known) Site Reference:	
3e - Please set out your representation below:				
In respect of the phasing of MG2(34) (LDP Written Stater of development on MG2(34) should be brought forward to	nent, p.148), notwithstanding th <mark>at</mark> this is a green the 2016-2021 phase or sooner for the following	field site and is therefore automatically principal reasons, many of which wou	phased to 2021-2026, it is proposed that phasing for completion lld strengthen Wick as a local hub:	l
Standards, RNIB criteria suitable for a full cross-section of 4. There is a heavy demand nationally for allotment space 5. It would encourage rural commerce and working from 6. It would directly support the emerging local green economics of the support the emerging local green economics.	last remaining local pub, small businesses, servicarbon housing stock in the rural Vale and provide the local and incoming population on all forms are and the proposal for this site would help to me home at an earlier date.	de an early intervention of accommodat of tenure. et this need on a local basis.	worship. tion built to Lifetime Homes, Welsh Housing Design Quality site recommends establishment of a car club as there would be	
3f - Please outline the changes you wish to see made to the D Re-phasing of MG2(34) as set out in Part 3e above.	eposit Plan to make it sound (if relevant)			
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspector a	about and why they consider it be nece	ssary to speak at the hearing -	

Representor ID and details: 4923/DP5 C&J Wood Susta	inable Design Partnersh	nip					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform			e consiered by 'written n of Public examination	n representations' or do on? Written
2a - Do you consider the LDP is Sound? Sound	2b - If you think that th Procedural Tests -	e Plan is unsound and P1 - Unanswered	does not not meet P2 - Unansw	` '	soundness, please	indicate which test(s)	that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	vered C3 - Unans	wered C4 - Ur	nanswered	
	Coherence and Effecti	veness Tests - CE1	- Unanswered (CE2 - Unanswered	CE3 - Unanswered	d CE4 - Unanswe	red
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrapl</u>	n Number:	Proposal Map:		Constraints Map	Appendices:
	MG21(2)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	resentation? Yes	(If	"No" or "Unanswered'	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amendo Unanswered	ed Site: Other (see N	lotes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name:	he site as a Candidate	Site? No	(If "Yes", plea	se give the Candida Site Refer	ate Site Name and reference:	erence if known)
3e - Please set out your representation below: As part of the proposal to include an additional parcel of I that the boundary to the Upper and Lower Thaw Valley SI					Settlement boundary	/ to include this addition	onal land, it is proposed
3f - Please outline the changes you wish to see made to the D Relocation of SLA boundary as Item 3e above.	eposit Plan to make it s	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your re	oresentation you wish to	speak to the inspecto	r about and why the	ey consider it be neces	ssary to speak at the	e hearing -	

Representor ID and details: 4923/DP6 C&J Wood Sustain	nable Design Partnership		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 ✓	Additional SA SEA		omments to be consiered by 'written representations' or do nearing session of Public examination? Written
•	2b - If you think that the Plan is unsound and or Procedural Tests - P1 - Unanswered	loes not not meet one or more test(s) of soun P2 - Unanswered	dness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered	d C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 -	Unanswered CE2 - Unanswered CE3	3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph	Number: Proposal Map:	Constraints Map Appendices:
	MG2(13)	MG6 - Residential Se Boundary	ttlement
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go	to 3d)
3c - What changes would like to see made to the Deposit Plan?			ew Or Amended Site: Other (see Notes): nanswered Yes
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate S Site Name:	(If "Yes", please give	ve the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: As part of the proposal to include an additional parcel of la	and within MG2(13), we propose an amendmen	t to the settlement boundary of Cowbridge to	include this additional land. See Fig 1 attached.
3f - Please outline the changes you wish to see made to the Do Amendment to the Settlement Boundary of Cowbridge as			
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector	about and why they consider it be necessary	to speak at the hearing -

Representor ID and details: 4924/DP1 Mr Luke Price							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		Rep format: Email	, ,	our comments to be o at a hearing session	,	•
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Procedural Tests -	Plan is unsound and do P1 - Unanswered	oes not not meet o		soundness, please in	dicate which test(s) t	hat it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	ered C3 - Unans	wered C4 - Una	nswered	
	Coherence and Effective	eness Tests - CE1 - L	Jnanswered (CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswere	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph N	Number: F	Proposal Map:	C	onstraints Map	Appendices:
	MG2(11)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	sentation? Unanswe	red (If "	'No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan			ew Paragraph: Inanswered	Amended Paragrap Unanswered	h: New Or Amended Unanswered	Site: Other (see No Unanswered	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit the Site Name:	e site as a Candidate Si	ite? Unanswere	d (If "Yes", plea	se give the Candidate Site Referer		rence if known)
3e - Please set out your representation below:							
My reason for appealing against the development, is first development will prevent our customers from being able t Thank you.							arket Place). The
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it so	ound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to	speak to the inspector a	about and why the	ey consider it be neces	sary to speak at the h	nearing -	

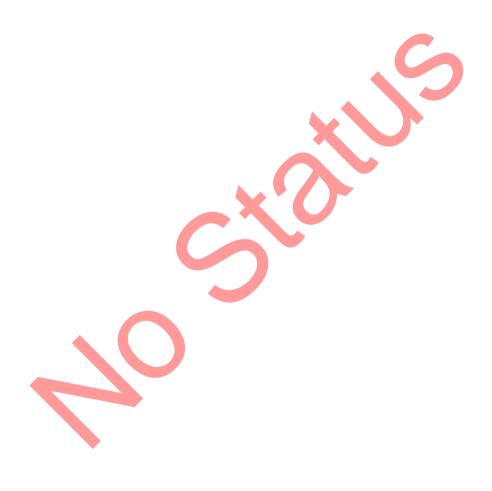
Supporting Evidence Modern	Representor ID and details: 4925/DP1 Mrs Wendy Hopki	ns		
Procedural Tests - P1 - Unanswered				
3a - Which part of the Deposit Plan are you commenting on? 4b - 10 you wish to see any changes made to the Deposit Plan are you for the Deposit Plan are you for the Deposit Plan are you wish to see any changes made to the Deposit Plan are a tesult of your representation? Yes What changes would like to see made to the Deposit Plan by Notes: 3d - If your representation relates to a new, deleted or amenue at site, did you submit the site as a Candidate Site? Note: 3d - If your representation relates to a new, deleted or amenue at site, did you submit the site as a Candidate Site? Note: 3e - Please set out your representation below: Policy MG2 — Housing Allocation. Policy MG2 of the LDP allocated 36 sites for residential development to provide for 7721 dwellings during the Plan period. These are to be located in a variety of towns 7 also within the defined Minor Rural Settlements. This spatial distribution of sites seeks to ensure that a full range & choice of sites are provided throughout the Vale of Glamorgan. This principle is fully supported. However, it is considered that there are alternative sites which meet the criteria for development and are also suitable and appropriate of seven perment and which could also be allocated for residential development without undermining the Statements within & adjacent to the village which are appropriate 8 suitable for development & counts of development and are also suitable and appropriate to accommodate a moderate level of new residential development. Folicy MG2 (33) currently allocates a 2.39 hectare site to the seat of the village for 50 residential units — (a separate site specific representation is submitted in respect of this site). However, it is considered that there are other sites within & adjacent to the village which are appropriate 8 suitable for development and set of the village for some sidential development on the section of the site and prominent of the village section of the site of the village form on this part of the village from north to ye	2a - Do you consider the LDP is Sound? Unsound	Procedural Tests - P1 - Unanswered P2 Consistency Tests - C1 - Unanswered C2 Coherence and Effectiveness Tests - CE1 - Unans	2 - Unanswered 2 - Unanswered C3 - Unanswered C4 - Unanswered swered CE2 - Yes CE3 - Unanswered CE4	
3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d) 3c - What changes would like to see made to the Deposit Plan? New Policy; Ves Unanswered Ves Unanswered Ves Unanswered Ves Unanswered Ves Unanswered 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name: 3e - Please set out your representation below: Policy MG2 of the LIDP allocated 36 sites for residential development to provide for 7721 dwellings during the Plan period. These are to be located in a variety of towns 7 also within the defined Minor Rural Settlements. This spatial distribution of sites seeks to ensure that a full range & choice of sites are provided throughout the Vale of Glamorgan. This principle is fully supported. However, it is considered that there are alternative sites which meet the criteria for development and are also suitable and appropriate sites for development and which could also be allocated for residential development without undermining the Situategy or damaging the Objectives coulding in the Plan. St Nicholas is identified as one of the Minor Rural Settlements & is therefore considered appropriate to accommodate a moderate level of new residential development. Policy MG2 (33) currently allocates a 2.39 hectare site to the east of the village for 50 residential units — (a separate site specific representation is submitted in respect of this site). However, it is considered that there are other sites within & adjacent to the village which are appropriate & south opportunity. The full extent of the landownership is outlined on the enclosed plan (CJP 1103.01). The site extends to approximately 3.15 hectares in total. It is rough, overgrown grazing land which gently slopes from north to south. Whilst it is considered that the whole site could be developed in a sensitive manner, the northern section	3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Numb	er: Proposal Map: Constraints	s Map Appendices:
Unanswered Ves Unanswered Ves Unanswered Ves Unanswered Ves Unanswered Ves Unanswered Notes: 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name: 3e - Please set out your representation below: Policy MG2 — Housing Allocation. Policy MG2 — Housing Allocation. Policy MG2 of the LDP allocated 36 sites for residential development to provide for 7721 dwellings during the Plan period. These are to be located in a variety of towns 7 also within the defined Minor Rural Settlements. This spatial distribution of sites seeks to ensure that a full range & choice of sites are provided throughout the Vale of Glamorgan. This principle is fully supported. However, it is considered that there are alternative sites which meet the criteria for development and are also suitable and appropriate sites for development and which could also be allocated for residential development without undermining the Strategy or damaging the objectives outlined in the Plan. St Nicholas is identified as one of the Minor Rural Settlements & is therefore considered appropriate to accommodate a moderate level of new residential development. Policy MG2 (33) currently allocates a 2.39 hectare site to the east of the village for 50 residential units — (a separate site specific representation is submitted in respect of this site). However, it is considered that there are other sites within & adjacent to the village which are appropriate & suitable for for development & could be allocated in addition or as an alternative to the MG2 (33) allocation. In this respect, a site at Duffryn Lane immediately to the south of the village is considered to be one such opportunity. The full extent of the landownership is outlined on the enclosed plan (CJP 1103:01). The site extends to approximately 3.15 hectares in total. It is rough, overgrown grazing land which genulty slopes from north to south. Whilst it is conside	3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes		
Site Name: Site Reference: 3e - Please set out your representation below: Policy MG2 — Housing Allocation. Policy MG2 of the LDP allocated 36 sites for residential development to provide for 7721 dwellings during the Plan period. These are to be located in a variety of towns 7 also within the defined Minor Rural Settlements. This spatial distribution of sites seeks to ensure that a full range & choice of sites are provided throughout the Valle of Glamorgan. This principle is fully supported. However, it is considered that there are alternative sites which meet the criteria for development and are also suitable and appropriate sites for development and which could also be allocated for residential development without undermining the Strategy or damaging the objectives outlined in the Plan. St Nicholas is identified as one of the Minor Rural Settlements & is therefore considered appropriate to accommodate a moderate level of new residential development. Policy MG2 (33) currently allocates a 2.39 hectare site to the east of the village for 50 residential units — (a separate site specific representation is submitted in respect of this site). However, it is considered that there are other sites within & adjacent to the village which are appropriate & suitable for development & could be allocated in addition or as an alternative to the MG2 (33) allocation. In this respect, a site at Duffryn Lane immediately to the south of the village is considered to be one such opportunity. The full extent of the landownership is outlined on the enclosed plan (CJP 1103:01). The site extends to approximately 3.15 hectares in total. It is rough, overgrown grazing land which gently slopes from north to south. Whilst it is considered that the whole site could be developed in a sensitive manner, the northern section is particularly suitables for a small scale residential development (See Plan CJP 1103:02). This section of the site (0.49 ha) is well related to the existing area with its trees & bird tables to the north and the exis	3c - What changes would like to see made to the Deposit Plan?	Unanswered Yes Unans		
Policy MG2 of the LDP allocated 36 sites for residential development to provide for 7721 dwellings during the Plan period. These are to be located in a variety of towns 7 also within the defined Minor Rural Settlements. This spatial distribution of sites seeks to ensure that a full range & choice of sites are provided throughout the Vale of Glamorgan. This principle is fully supported. However, it is considered that there are alternative sites which meet the criteria for development and are also suitable and appropriate sites for development and which could also be allocated for residential development without undermining the Strategy or damaging the objectives outlined in the Plan. St Nicholas is identified as one of the Minor Rural Settlements & is therefore considered appropriate to accommodate a moderate level of new residential development. Policy MG2 (33) currently allocates a 2.39 hectare site to the east of the village for 50 residential units — (a separate site specific representation is submitted in respect of this site). However, it is considered that there are other sites within & adjacent to the village which are appropriate & suitable for development & could be allocated in addition or as an alternative to the M62 (33) allocation. In this respect, a site at Duffryn Lane immediately to the south of the village is considered to be one such opportunity. The full extent of the landownership is outlined on the enclosed plan (CJP 1103:01). The site extends to approximately 3.15 hectares in total. It is rough, overgrown grazing land which gently slopes from north to south. Whilst it is considered that the whole site could be developed in a sensitive manner, the northern section is particularly suitable for a small scale residential development (See Plan CJP 1103:02). This section of the site (0.49 ha) is well related to the existing settlement patter with the public open space sitting area with its trees & bird tables to the north and the existing residential development on this section of the site is	3d - If your representation relates to a new, deleted or amende			me and reference if known)
of the LDP. 3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)	Policy MG2 — Housing Allocation. Policy MG2 of the LDP allocated 36 sites for residential desettlements. This spatial distribution of sites seeks to ensithere are alternative sites which meet the criteria for deverthe Strategy or damaging the objectives outlined in the Plast Nicholas is identified as one of the Minor Rural Settlem Policy MG2 (33) currently allocates a 2.39 hectare site to there are other sites within & adjacent to the village which In this respect, a site at Duffryn Lane immediately to the site extends to approximately 3.15 hectares in total. It is remanner, the northern section is particularly suitable for a spublic open space sitting area with its trees & bird tables to development opportunity which would round — off & consumptions. As can be seen from the attached Context Plan (CJP 110 (edged blue) can be retained as open space which could presidents to purchase properties at a realistic price therebenhance the range & choice of housing opportunities avaitable.	ure that a full range & choice of sites are provided thropment and are also suitable and appropriate sites for an. ents & is therefore considered appropriate to accommodate east of the village for 50 residential units — (a separe appropriate & suitable for development & could be south of the village is considered to be one such oppough, overgrown grazing land which gently slopes from an all scale residential development (See Plan CJP 1: to the north and the existing residential development a colidate the built up area of the village. 3:03) development on this part of this site relates to the provide for recreational opportunities & would also accommodate the built up area of the village.	roughout the Vale of Glamorgan. This principle is fully supported. or development and which could also be allocated for residential or development and which could also be allocated for residential modate a moderate level of new residential development. Parate site specific representation is submitted in respect of this specific allocated in addition or as an alternative to the MG2 (33) allocated trunity. The full extent of the landownership is outlined on the end month to south. Whilst it is considered that the whole site could 103:02). This section of the site (0.49 ha) is well related to the exact Button Ride to the east. New development on this section of the more dense existing residential development in this part of the tas an appropriate buffer between the built up area and the Windfully developed for a limited development of affordable open mar community. The site would be an attractive proposition to a local	. However, it is considered that development without undermining site). However, it is considered that ation. closed plan (CJP 1103:01). The libe developed in a sensitive disting settlement pattern with the ne site is an appropriate e village. The remainder of the site chpit SINC (No 177) to the south. rket units which would enable local all developer & would assist &

(ordered by Representation ID No.)

Representor ID and details: 4925/DP1 Mrs Wendy Hopkins

Policy MG2 of the LDP should be amended to include a further residential allocation for the site as indicated at Duffryn Lane, St Nicholas. The proposals map should also be amended to reflect such an allocation.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - Alternative potential residential allocations need to be fully debated so that the merits of alternative and allocated sites can be fully assessed.



(ordered by Representation ID No.)

Representor ID and details: 4926/DP1 Catrin Thomas-P	rice						
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		Rep format: Eform	•	•	be consiered by 'writter sion of Public examination	•
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	P1 - No	P2 - No	` `		se indicate which test(s)) that it fails.
	Consistency Tests - Coherence and Effecti		C2 - No - No	C3 - No CE2 - Yes	C4 - CE3 - No	No CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			• • • •
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	Policy: No Notes:	Amended Policy: Yes	New Paragraph: No	Amended Paragra No	ph: New Or Ame Yes	ended Site: Other (see No	Notes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name: Land wes			(If "Yes", ple	J	didate Site Name and reference: 2446/CS1 and	,

3e - Please set out your representation below:

My representation:

I do not believe the plan to build 100 houses, with 35% affordable housing, around St Athan is sound because:

TRANSPORT

While the plans include "realigning" St Athan Road, they do not show how a major bottleneck is to be prevented at the crossroads with Eastgate.

The new housing has not being catered for by new local employment opportunities. There has been no obvious increase in job opportunities, on the scale needed, within Cowbridge. Incoming new residents would have to commute to their places of work, increasing congestion.

Non-working members of new families would also increase traffic levels. Although on a map this location appears convenient to the high street, it is on a slope. For shopping, school runs etc, it is highly unlikely that the new homemakers would walk to the high street if they could drive instead.

PARKING

This has been a topic of ongoing debate in Cowbridge for some time and is another symptom of the lack of transport planning. Insufficient parking is the greatest threat to Cowbridge High Street. Cowbridge pedestrians simply do not spend enough money to keep the many premium boutiques and independent outlets going. Some of these are already struggling due to high rents and the ongoing credit squeeze. Parking places must be provided for visitors if the town is to continue to prosper and to retain its character. Increasing the number of residents (who will soon learn to grab parking spaces early in the day before visitors have a chance), without providing additional parking, would be damaging to the town economy.

IMPACT ON OTHER AREAS OF THE VALE

Creating new urban areas in the Vale might lead to stagnation and decline elsewhere. Parking aside, Cowbridge is a prosperous and successful town; it is hard to see how it could significantly benefit from any investments arising from this development. But developing Cowbridge, for little benefit, might funnel money away from existing urban areas that really do need investment – such as Barry, for example. Given the level of local opposition to this plan, this seems like a lose-lose outcome for everyone concerned.

LANDSCAPE

Because of the rural nature of the areas around Cowbridge, extra traffic, congestion and pollution would have a real, and negative, impact on the local landscape.

In addition there may be drainage concerns. The fields are very swampy and boggy and they may act as a natural drainage area. I have not seen any evidence that the consequences of concreting it over have

(ordered by Representation ID No.)

Representor ID and details: 4926/DP1 Catrin Thomas-Price

been properly considered.

QUALITY OF LIFE

Consideration should be given to the probably quality of life for the new inhabitants. Commuting long distances is expensive, energy-wasteful, impacts on family life and can be stressful in itself. As mentioned, the fields are on a slope, which does not make life easier for anyone carrying shopping, pushing children in prams or walking young children around (as I can testify), or for anyone elderly. Finally, there is a sewage treatment facility at the bottom of the field. I do not believe that anyone given a choice would choose to live in such a location.

ALTERNATIVE SITE

I suggest that more development is centred upon areas that need investment such as Barry. But if that is not enough, then rather than tacking on small but damaging developments to Cowbridge and the surrounding villages, I suggest building an entirely new village or small town in Llandow. I believe that creating a new town from scratch can be a marvellous thing. It allows existing towns and villages to retain their characters, while the new town itself can be designed from the ground up using all the latest, greenest technologies to be economic, energy-efficient, and convenient for the inhabitants. I would compare it to building a new, perfectly-planned house – instead of shoring up and adding extensions and lean-tos to an old house. The second strategy frequently achieves very little compared to what could have been achieved, and damages the old house – or town – besides.

UK Ministers have recently emphasised that the new planning rules were not intended to create an excuse to build on greenfield land, but were meant to be an opportunity to make it easier to build on brownfield land – Llandow represents just such an opportunity. Rather than create an "unintended consequence" of the new rules, I hope the Council will take advantage of this opportunity, in the way that was intended.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
Keep the areas referred to as a Special Landscape site

Keep the Cowbridge boundary as it it currently is, ie as greenfield land used by the community

Consider building a completely new development in Llandow in order to provide new housing, including affordable housing

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

Representor ID and details: 4927/DP1 Revd Heather We	eddell					
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?					
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered					
	Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered					
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered					
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Proposal Map: Constraints Map Appendices:					
	MG2(11)					
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)					
3c - What changes would like to see made to the Deposit Plan	? <u>New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes):</u> Unanswered Unanswered Unanswered Unanswered					
	Notes:					
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:					
	e as parking for the town. Many elderly and less mobile people who attend my church use it because the roadside parking in Westgate is often rhousing will create further traffic issues in an area that is already dangerous.					
3f - Please outline the changes you wish to see made to the D	veposit Plan to make it sound (if relevant)					
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -					

Representor ID and details: 4929/DP1 Ms Lynne J Duar		Day farmed As de very work w	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	· · · · · · · · · · · · · · · · · · ·		our comments to be consiered by 'written representations' or cat a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and doe Procedural Tests - P1 - Unanswered	es not not meet one or more test(s) of P2 - Unanswered	soundness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered	vered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Un	answered CE2 - Unanswered	CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Nu MG2(13). MG2(11)	mber: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your representation? Unanswere	d (If "No" or "Unanswered"	- go to 3d)
3c - What changes would like to see made to the Deposit Plan		w Paragraph: Amended Paragrap answered Unanswered	n: New Or Amended Site: Other (see Notes): Unanswered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site Site Name:	? Unanswered (If "Yes", pleas	se give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below:			
I wish to object to house building in 2 places with regard to -Windmill Lane area -Cattle Market	o Cowbridge:		
The Windmill Lane area is outside the Cowbridge bounda The land is used by the general public for recreation. Access from the St Athan road would be unsuitable.	ry and is in the countryside.		
The cattle market should be developed as car parking if t It is extremely difficult to find a parking place in the town.			
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
4h - If you wish to speak, please confirm which part of your re-	presentation you wish to speak to the inspector ab	out and why they consider it he neces	sary to speak at the hearing -

Representor ID and details: 4930/DP1 Roger Jones							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			e consiered by 'written on of Public examination	representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	e Plan is unsound and P1 - No	does not not mee P2 - No	et one or more test(s) of	soundness, please	,	that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 - N	lo	
	Coherence and Effecti	veness Tests - CE1 -	No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(11	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	New Policy:		New Paragraph: No	Amended Paragrap No	h: New Or Amend Yes	ded Site: Other (see N	lotes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	•			(If "Yes", plea	0	ate Site Name and reference: 2446/cs.1 24	,
3e - Please set out your representation below:							
Objections to the proposed development include:							
Spoiling of rural character, landscape and open views in sover-sized, twin 'mansions' in prominent positions in Wind						rounding it? (For exam	ple, recent building of
Proposed develoment is outside Cowbridge boundary into	open countryside.						
Infrastructure (in terms of schooling, roads, sewerage) is	inadequate and it is diff	icult to see how provision	ons can be made	to accommodate the ac	dditional demands	that the allocation of ne	ew housing will create.
3f - Please outline the changes you wish to see made to the D Candidate site should be removed and included as a gree		,	deration.				
4b - If you wish to speak, please confirm which part of your re	presentation you wish to	speak to the inspector	about and why th	nev consider it be neces	ssarv to speak at th	ne hearing -	

Representor ID and details: 4931/DP1 Pamela W. Jones	S			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		r comments to be consiered by 'written representation a hearing session of Public examination?	ons' or do
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and or Procedural Tests - P1 - Unanswered	loes not not meet one or more test(s) of so P2 - Unanswered	oundness, please indicate which test(s) that it fails.	
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswe	ered C4 - Unanswered	
	Coherence and Effectiveness Tests - CE1 -	Unanswered CE2 - Unanswered C	CE3 - Unanswered CE4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph MG2(11)	Number: Proposal Map:	Constraints Map Appendice	es:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswe	ered (If "No" or "Unanswered" -	go to 3d)	
3c - What changes would like to see made to the Deposit Plan		New Paragraph: Amended Paragraph: Unanswered Unanswered	New Or Amended Site: Other (see Notes): Unanswered Unanswered	
	Notes:			
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate S Site Name:	Site? Unanswered (If "Yes", please	give the Candidate Site Name and reference if known Site Reference:	wn)
3e - Please set out your representation below: I wish to object to the proposed development on the Cowl	bridge cattle market site on the following ground	ds:		
The cattle market has been an integral part of the Vale purchase necessary items. Hence a further loss to local be		ss would be detrimental to their livelihood a	nd require them to go further afield to sell their lives	tock and
2. The town car parking is already inadequate and will be capacity. Cowbridge is a 'destination' shopping town but we			sed by staff and the park behind the Town Hall is us	sually full to
3. The suggestion of 45 dwellings on this site is far too gr Westgate.	eat a density and the ensuing traffic to and from	such a development would cause great co	ongestion around the Butts area and on entering and	d leaving
In summary, I should prefer that the cattle market is retain	ned with proper provision i.e. well surfaced, for s	substantial numbers of cars to be parked.		
3f - Please outline the changes you wish to see made to the D	reposit Plan to make it sound (if relevant)			
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector	about and why they consider it be necessa	ıry to speak at the hearing -	

Representor ID and details:	4932/DP1 Mr Victor &	Mrs Maria Lewis						
Date Lodged Status Petition 01/04/2012 M	on and No. Supporting Evi	dence Additional SA SEA		Rep format: Email	,	your comments to be cook at a hearing session of	,	•
2a - Do you consider the LDP i	s Sound? Unanswered	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	l does not not meet P2 - Unansw	` '	f soundness, please inc	dicate which test(s)	that it fails.
		Consistency Tests -	C1 - Unanswered	C2 - Unansw	ered C3 - Unan	swered C4 - Unai	nswered	
		Coherence and Effec	tiveness Tests - CE1	- Unanswered (CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	ered
3a - Which part of the Deposit	Plan are you commenting	on? Policy Number:	Paragrap	h Number:	Proposal Map:	Co	onstraints Map	Appendices:
		MG2(11)						
3b - Do you wish to see any ch	anges made to the Deposi	t Plan as a result of your rep	presentation? Unansv	wered (If '	'No" or "Unanswered	d" - go to 3d)		
3c - What changes would like t	o see made to the Deposit	Plan? New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amended Unanswered	Site: Other (see N Unanswered	
		Notes:						
3d - If your representation rela	ates to a new, deleted or ar	nended site, did you submit Site Name:	the site as a Candidate	Site? Unanswere	ed (If "Yes", ple	ase give the Candidate Site Referen		erence if known)
3e - Please set out your repre Redevelopment of Cowbi		sing will have a devastating	effect on Cowbridge. P	arking is already a p	roblem at the weeke	nds and other busy day	s.	
We enjoy a day out at Co will certainly lose out.	owbridge frequently, parking	g sometimes being impossib	ole, this proposition will	make the problem e	ven worse. The shop	ping centre will be affec	cted and eating plad	ces and public houses
Cowbridge is one of the f	ew special little towns left i	n the Vale, it will be a pity to	reduce it to another gh	ost town full of char	ity shops, estate age	nts etc.		
3f - Please outline the change	s you wish to see made to	the Deposit Plan to make it	sound (if relevant)					
4h - If you wish to speak inlea	se confirm which part of vo	ur representation you wish	to speak to the inspecto	or about and why the	ev consider it be nece	essary to speak at the h	earing -	

Representor ID and details: 4933/DP1 Andrew & Jona	than Raymond
<u>Date Lodged</u> <u>Status</u> <u>Petition and No.</u> <u>Supporting Eviden</u>	
02/04/2012 M 🔲 0	Comment form you want to speak at a hearing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:
	90. 77
3b - Do you wish to see any changes made to the Deposit Plant	lan as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Pla	an? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Yes Unanswered
	Notes:
3d - If your representation relates to a new, deleted or amen	nded site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known) Site Name: A. Delete site land to the rear of St Davids Church in Wales Primary Scho Site Reference: MG2 (28)
3e - Please set out your representation below: Proposed alternative site proposal at land at and adjoin	ning Waterton Lodge, Colwinston. This site is proposed for residential development on 6.5 acres of land.
The representation also seeks the deletion of proposed	I allocation MG2(28)
Please see enclosed report for more information	
3f - Please outline the changes you wish to see made to the	
Delete site allocation MG2(28) and allocate alternative s	site for development.
Justification and further information is provided in the er	nclosed report.
4b - If you wish to speak, please confirm which part of your r Proposed alternative site	representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 4934/DP1 Mrs Emilia Anders	son					
Date Lodged Status Petition and No. Supporting Evidence 01/04/2012 M □ 0 □	Additional SA SEA	_		, ,	comments to be consiered hearing session of Public of	by 'written representations' or do examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan Procedural Tests - P1 -		s not not meet one P2 - Unanswere	` '	ndness, please indicate wh	ich test(s) that it fails.
	Consistency Tests - C1 - Coherence and Effectiveness			ed C3 - Unanswere 2 - Unanswered CE		Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(11)	Paragraph Nur	mber: <u>Pro</u>	pposal Map:	<u>Constraints</u>	s Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representa	ation? Unanswered	I (If "No	o" or "Unanswered" - go	to 3d)	
3c - What changes would like to see made to the Deposit Plan?					New Or Amended Site: Ot Unanswered Ur	her (see Notes): nanswered
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site Site Name:	as a Candidate Site?	? Unanswered	(If "Yes", please gi	ive the Candidate Site Nan Site Reference:	ne and reference if known)
3e - Please set out your representation below: Redevelopment of Cowbridge Cattle Market for housing w We enjoy a day out at Cowbridge frequently, parking som	-					eating places and public houses
will certainly lose out. Cowbridge is one of the few special little towns left in the						calling places and public flouses
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound ((if relevant)				
4h - If you wish to speak please confirm which part of your rer	recentation you wish to speak	k to the inspector abo	ut and why they o	consider it he necessary	to speak at the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4935/DP1 Karen Harris						
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		Rep format: Eform	, ,		ered by 'written representations' or do blic examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		d does not not mee P2 - Yes	et one or more test(s) of	soundness, please indicate	e which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 - Yes	
	Coherence and Effect	iveness Tests - CE1	- No	CE2 - Yes	CE3 - No C	E4 - No
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:	Constra	aints Map Appendices:
	MG2(15)					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered"	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	h: New Or Amended Site:	Other (see Notes):
	No	No	No	No	Yes	No
	Notes:					
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	e Site? No	(If "Yes", pleas	se give the Candidate Site Site Reference:	Name and reference if known)
				7		

3e - Please set out your representation below:

I wish to strongly object to the proposed inclusion of the site to the rear of Heol Y felin/ Nant y Adar as an area proposed for development. It is proposed as a huge housing estate to hold 350 new houses, site ref: MG 5 (12).

Initially I am holey opposed to the development of another large scale housing estate in the rural village of Llantwit major, reasons and concerns which are shared with all other residents which I have discussed this issue with. Loss of our sense of rural character, and pressure on our already crippling local amenities i.e. doctors, schools, town centre, access to local beach, employment opportunities etc will be greatly compromised. Especially at this proposed site, this is valued as the back drop to the already built environment and a buffer to the start of the Glamorgan Heritage Coast which is highly valued characteristic of our village.

Practically I struggle to see how the proposed site and proposed access point can be seen as sound and best practical option for development due to the following reasons:

- •Existing road network into Llantwit Major suffers with problems; the access to Boverton already is a bottle neck and dangerously blocks several times a day with school buses, public transport buses, lorries, refuse lorries having to access Llantwit and Boverton via a sharp blind bend. The proposed access road down Ham Lane is already used as access to three local schools (2 primary and 1 comprehensive) and suffers badly with congestion especially at school drop off times. The residential areas directly off this trunk road already suffer difficult and dangerous access issues due to increase in traffic flow and parked cars in this area, the local police support officer is often seen moving cars on when complaints are made, but as soon as a police presence is not there congestion and dangerous parking practices resume. Access to the west of Llantwit is via a single track road with speed bumps and I cannot see how this access route could be seen as a viable access route for a proposed development of this site. By the nature of human beings we will endeavour to use the most direct route to get to their houses and these access routes will suffer considerably.
- •Llantwit town centre is congested, existing car parks in this area are already inadequate and jammed, and the proposed housing development could potentially bring in excess of 1000 extra vehicles using our village roads!
- •As reported in the local press our local comprehensive has had the funding which was previously ring fenced for a future rebuild withdrawn, this is as a result of the money being over spent on the rebuild of the comprehensive in Cowbridge and all remaining funds allocated to the rebuild of the comprehensive in Penarth, Llantwit has been described as the 'poor cousin' in relation to these areas, how can our already underfunded and ageing facilities be seen as able to sustain such an increase in population? One of the Local primary schools is due to close in the next few years due to its failing facilities and plans area already in place for the primary school on Ham lane (the proposed access road) to absorb the pupils, effectively doubling its size and demands on the existing buildings and access route. Residents already travel to Cowbridge and Barry to use the superior leisure centres as the Vale leisure centre in Llantwit has not changed in all the years I have lived here (which is 30 years!) the scale and quality is incomparable with those previously mentioned and funding is definitely needed to raise standards to meet demand for these facilities, therefore how can these existing facilities already be seen as sustainable for such a proposed large scale housing development. Needless to say you have to already wait 2-3 weeks to get a doctors and dentist appointment in Llantwit Major.

(ordered by Representation ID No.)

Representor ID and details: 4935/DP1 Karen Harris

- •I would really and strongly want to raise concern regarding the flood risk posed by this potential building site and resulting housing development. As a local resident of 30years, I have seen the Hodnant river flood many times due to high rain fall in Boverton and low land valley area due to increase surface water runoff and inadequate drainage systems. If an area as large as the proposed development site is concreted the significant increase in amount of surface water which as it does at present will not now be able to soak away will have drastic effects, the knock on effect to the immediate area and further down river will cause extreme flooding and huge flood prevention measures will be required. I cannot see how this area can even be proposed for inclusion in the Local Development Plan before an extensive environmental/flood risk survey is carried out and what mitigation measures would be required, how could the expense of this development and disruption and change to the existing nature (which is already designate as an area of natural beauty) be sustainable?
- •Moving away from the existing natural areas including the beach in Llantwit. The provision of 'play areas' other than rugby and football pitches, is minimal. I have two young boys and find myself going to Cowbridge and Barry parks to use the play areas as there is more area for them to run around and variety in equipment etc. I would be interested to know what the proposed development plan for the site MG 5 (12) ratio of housing to open spaces and play area within this area is as lack of outside parks with increase in young people, which inevitable coupled with inadequate space may run the risk of further anti social behaviour.
- •At the consultation event held in the town hall the Vale of Glamorgan council representative I spoke to was unable to clarify what the proposed term 'RESERVE' site actually meant. The line I was given was that if housing is needed that this area would be used, I questioned whether existing supply of housing is ever assessed i.e. that available in local estate agents, and I was told NO that existing supply or houses available to purchase is not assessed, can this please be clarified. I am opposed to the inclusion on this site in the LDP without further clarification of the term 'RESERVE' If the site is not required and is above and beyond the requirement set out as required as the term reserve would suggest, it's inclusion in the LDP is entirely unnecessary. This area is highly valued area of GREEN FIELD and should not be included especially as such a large area. It is a great slice of all that is lovely and idyllic about the countryside and provides an essential corridor for wildlife, both flora and fauna, it adds to the quality of life of those existing residents in Llantwit Major especially those who have chosen to live within view of this proposed site.
- •I believe that this proposed site in itself contradicts all that local and national policy promotes regarding sustainability and local planners have a responsibility to the local community and environment both rural and coastal to find best practicable solution to housing requirement without compromising quality of life of existing residents who choose to live in the historic village of Llantwit Major and their children and future residents of Llantwit Major as it exists today.

Thank you for your time and judgement in making the decision about the withdrawal/inclusion of MG 5 (12) in the LDP, I do hope that this area is removed from the Local development plan and this is also true of so many other residents who are too intimidated and put off with form filling to put down their thoughts. I have been asked to help those who I know and there are many more who have not commented but I do now that they do hope that this area is not approved for inclusion.

Yours sincerely Karen Harris

of - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant	
Withdrawal of MG 2(15) as proposed site for development.	

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

Representor ID and details: 4936/DP1 Shaun Barker										
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	, ,		be consiered by 'writter ion of Public examination	n representations' or do on? Written			
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - No P2 - No									
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No				
	Coherence and Effecti	veness Tests - CE1	- No	CE2 - Yes	CE3 - No	CE4 - No				
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:			
				MG2						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)					
3c - What changes would like to see made to the Deposit Plan'	New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	ph: New Or Amen	nded Site: Other (see N	Notes):			
	No	No	No	No	Yes	No				
	Notes:									
3d - If your representation relates to a new, deleted or amende	d site, did you submit the Site Name: Land to the			(If "Yes", plea	J	date Site Name and reference: 2446/C5.1 2	ference if known) 2446/C5.2			
3e - Please set out your representation below:				,						
The existing infrastructure in this location would be unable on this section of Cowbridge.	to support this propose	ed housing developme	ent without major w	vorks being carried out.	Any substantial w	ork carried out would h	ave a detrimental effect			
3f - Please outline the changes you wish to see made to the D Remove this site from the plans and designate as "green	•	`	uture.							
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to	speak to the inspect	or about and why t	hey consider it be nece	ssary to speak at t	he hearing -				

Representor ID and details: 4938/DP1 Peter Cope							
Date Lodged Status Petition and No. Supporting Evidence 26/03/2012 M ✓ 115 □	Additional SA SEA		Rep format: Letter	•	your comments to be con at a hearing session of l	•	•
2a - Do you consider the LDP is Sound? Unanswered	•	he Plan is unsound and P1 - Unanswered	d does not not mee P2 - Unans	` '	f soundness, please indic	cate which test(s)	that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unans	wered C3 - Unan	swered C4 - Unans	wered	
	Coherence and Effec	tiveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	red
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:	<u>Con</u> :	straints Map	Appendices:
	MG2(15)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Unans	wered (I	f "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	? <u>New Policy:</u> Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amended Si Unanswered	ite: Other (see N Unanswered	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	e Site? Unanswe	red (If "Yes", plea	ase give the Candidate S Site Reference		erence if known)
3a - Please set out your representation helow:				-			

- - VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN STATEMENT OF REPRESENTATIONS BY LOCAL RESIDENTS OBJECTING TO PROPOSAL MG2(15) FOR THE REASONS SET OUT BELOW.
 - (1) Policy MG1 states that the housing requirement is for 9,950 dwellings over the plan period, with priority being given to brownfield and committed sites. Proposal MG2(15) is a greenfield site and its proposed allocation as a potential reserve housing site is clearly therefore inconsistent and incompatible with the Council's overall strategy.
 - (2) A development of the scale proposed would have a huge and totally unacceptable impact on the amenities at present enjoyed by local residents.
 - (3) The land which is proposed for development at present forms natural and pleasant countryside which is included within the boundaries of the Glamorgan Heritage Coast, and which forms a strong natural green backcloth to existing development in this part of the town. Residents are extremely concerned that the Heritage Coast boundary appears to have been changed without any form of public information or consultation.
 - (4)The proposal to serve a development of the scale envisaged by means of just one restricted and sub standard vehicular access off Nant -yr- Adar, creating a potentially dangerous crossroads intersection, is totally unacceptable in terms of highway and public safety.
 - (5) The level of traffic generated by a development of the scale proposed would have a massive impact on the adjoining housing estate in terms of increased disturbance, pollution and vehicle usage and would have severe implications for public safety. Furthermore it would create huge and unacceptable difficulties on the adjacent road network, notably Ham Lane East and Boverton Road, which are already overstretched and at regular intervals, severely congested because of the substantial traffic generated by the Comprehensive School, two Primary Schools, the Leisure Centre and the Roman Catholic Church. The implications of such a large new development to the rear of Nant-vr-Adar, in terms of highway and public safety would therefore be huge, totally unacceptable and unsustainable.
 - (6) There would be massive disruption to the local environment during construction operations which would be over several years, again raising fundamental issues of increased significant disturbance, increased pollution, loss of amenity and public safety.
 - (7) The construction of the proposed vehicular access to the development site, and the necessary associated bridgeworks over the Hoddnant Stream, would inevitably involve the removal of a number of substantial trees which make a valuable contribution to the local environment, and would also impact detrimentally on the Hoddnant Stream valley, which again is an important and valuable landscape feature in this locality. Furthermore the Hoddnant Stream forms a clear and logical natural boundary to existing development in this part development beyond the stream.
 - (8) In general terms we remain to be convinced that Llantwit Major needs to absorb the scale of new development envisaged in the Local Development Plan, particularly bearing in mind the scale of new development which has taken place in the town in recent years, and other relevant considerations such as the significant scaling down of operations at PAF/MOD St. Athan

(ordered by Representation ID No.)

Representor ID and details: 4938/DP1 Peter Cope

(9)The plan identifies housing site MG2(15) as a reserve site which will be brought forward for development if required. There is no effective explanation in the documentation as to what this actually means, but even if this land is only being considered for release towards the end of the plan period, it cannot be refuted that the Local Development Plan is identifying the land now as a potential large scale housing site. This inevitably raises great concern for local residents and creates a form of planning blight It is the firm view of local residents therefore that Proposal MG2(15) should be deleted from the plan proposals now to eliminate uncertainty.

- (10) Officers at the local exhibition were asked what stance the Council would take in the event of a planning application being submitted now for the residential development of the proposed site MG2(15). Officers advised that such a planning application would be refused on grounds of prematurity which seems to local residents to raise a plethora of complicated legal and planning issues which can only be satisfactorily resolved by the deletion of the site from the Local Development Plan at this stage.
- (11) The proposed development on the scale envisaged will have a major impact on local services, particularly local health and educational facilities which are already severely overstretched.
- (12)The fact that the lower parts of the proposed development site are indicated as being within a potential flood zone must raise serious doubts about the desirability of developing this land for housing. Furthermore there have been suggestions locally that the land contains features of archaeological interest which again may militate against the practical development of the site.
- (13)The proposal does not appear to give weight to nature conservation interests in this locality. There is for example strong evidence of badger colonies within the confines of the proposed development site, and probably other significant wildlife.
- (14)Local Residents fully accept the need for more housing land to meet housing demand within the Vale of Glamorgan over the plan period, with particular provision for lower cost housing and the needs of the first time buyer. It is our view however that Proposal MG2(15), particularly on the scale envisaged, has not been properly and effectively appraised, especially with regard to (a) the provision of satisfactory road access (b) the real dangers of flooding within the site © the massive impact of the proposed development on local residential amenities and (d) the implications of significant and thereafter.
- (15)The fundamental principles and Policies within the Local Development Plan give emphasis to the protection of the open countryside and areas of special landscape and environmental value, the interests of nature conservation and the wider interests of highway and public safety. Proposal MG2(15) appears to local residents to be in total conflict with these policies and principles and in the view of local residents to promote a new housing development of the scale envisaged and in the location proposed would be unsustainable and totally contrary to good and sound environmental and traffic planning It is therefore the firm view of local residents that Proposal MG2(15) should be deleted from the Local Development Plan at this stage, and that other; less damaging; options should be considered for the accommodation of new housing developments, which more effectively fulfil the tests of sustainability and good planning practice.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 4939/DP1 West Side Ltd	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 ✓	<u>Rep format:</u> 4a - do you want your comments to be consiered by 'written representations' or do <u>✓</u> you want to speak at a hearing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Yes Policy Number: Proposal Map: Constraints Map Appendices: Yes
3b - Do you wish to see any changes made to the Deposit Pla	in as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plar	n? New Policy: Amended Policy: New Paragraph: Amended Paragraph: Unanswered U
3d - If your representation relates to a new, deleted or amend	led site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
alternatively by allowing a degree of flexibility to the settl	
3f - Please outline the changes you wish to see made to the We object to the non-inclusion of the site to the rear of F	Deposit Plan to make it sound (if relevant) factory Road, Llanblethian within the settlement boundary as shown on the Proposals Map.
4b - If you wish to speak, please confirm which part of your re In order to present the full case before the appointed Ins	epresentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - pector.

Date Lodged Status Petition and No. Supporting Evidence	Additional SA SEA		Rep format:	4a - do you wa	int your commer	its to be consiered by 'writte	en representations' or do
02/04/2012 M	\checkmark		Comment form	you want to sp	eak at a hearing	session of Public examinat	tion? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	I does not not meet P2 - Unans	•	s) of soundness,	please indicate which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unans	wered C3 - Ur	nanswered	C4 - Unanswered	
	Coherence and Effec	tiveness Tests - CE1	- Unanswered	CE2 - Yes	CE3 - Una	nswered CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
	78						
Bb - Do you wish to see any changes made to the Deposit Plar	as a result of your rep	oresentation? Yes	(If	"No" or "Unanswe	ered" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered	Amended Policy: Yes	New Paragraph: Unanswered	Amended Para Unanswered	graph: New Or Yes	Amended Site: Other (see	
	Notes:	res	Unanswered	Unanswered	res	Unanswere	eu
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name: Land at		Site? Yes	(If "Yes",	-	Candidate Site Name and re e Reference: 2558/CS1	eference if known)
3e - Please set out your representation below:				-			
It is considered that Policy MG29 - Tourism and Leisure F comprises of a single derelict dwelling and vacant land. T					Vell Bay Road. T	he site is located in a coast	al location which current
The site offers an appropriate location for a tourism facilit for tourism purposes is a logical form of development in c						olicy SP11 - Tourism and L	eisure. The use of the si
The development of the site for tourism use would also go	enerate employment o	pportunities.					
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it	sound (if relevant)					
POLICY MG29 - TOURISM AND LEISURE FACILITIES I		The second secon					
THE PROVISION OF ALL YEAR ROUND TOURISM AND RELATED DEVELOPMENT:	LEISURE FACILITIE	S IN THE BARRY ARE	A WILL BE FAVO	JRED. LAND IS AI	LOCATED AT 1	THE FOLLOWING LOCATION	ONS FOR TOURISM
1. BARRY ISLAND PLEASURE PARK, WHITMORE BAY 2. LAND AT MELL'S POINT, WHITMORE BAY; 3. THE TRIANGLE SITE, BARRY WATERFRONT AND 4. LAND AT ST.MARY'S WELL BAY ROAD, PENARTH.	;						
4b - If you wish to speak, please confirm which part of your re	presentation you wish	to speak to the inspecto	or about and why th	ev consider it be n	ecessary to spea	ak at the hearing -	

Representor	ID and d	letails:	4939/D	P3 West Side Ltd							
Date Lodged	Status	Petitio	on and No.	Supporting Evidence	Additional SA SEA		Rep format:				n representations' or do
02/04/2012	М		0	✓	✓		Comment forn	n you want to spea	ak at a hearing sess	ion of Public examinat	ion? Examination
2a - Do you co	onsider tl	he LDP	is Sound?	Unsound	2b - If you think that th	ne Plan is unsound an	d does not not mee	et one or more test(s)	of soundness, pleas	se indicate which test(s	s) that it fails.
					Procedural Tests -	P1 - Unanswered	P2 - Unans	swered			
					Consistency Tests -	C1 - Unanswered	C2 - Unans	swered C3 - Una	nswered C4 -	Unanswered	
					Coherence and Effect	iveness Tests - CE1	l - Unanswered	CE2 - Yes	CE3 - Unanswei	red CE4 - Yes	
3a - Which pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:	<u>Paragra</u>	oh Number:	Proposal Map:		Constraints Map	Appendices:
					49			Yes			
3b - Do you w	ish to se	e any cl	nanges ma	de to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswere	ed" - go to 3d)		
3c - What cha	nges wo	uld like	to see mad	de to the Deposit Plan?	New Policy:	Amended Policy:	New Paragraph:	Amended Paragr	aph: New Or Amer	nded Site: Other (see	Notes):
					Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswere	d
					Notes:						
3d - If your re	presenta	ation rela	ates to a ne	ew, deleted or amende	•		e Site? Yes	(If "Yes", pl	-	date Site Name and re	eference if known)
					Site Name: Land at C	Constitution Hill			Site Ref	erence: 2419/CS1	
3e - Please s	,										
Cowbrid	ge to acc	commod		187 units, this is far les						ments. Whilst the Plan smaller 'Primary' settle	has allocated land in ements of Dinas Powys
3f - Please o	utline the	change	es you wish	to see made to the De	eposit Plan to make it s	sound (if relevant)					
We there	efore obj	ect to th	e non-inclu	usion of the Alternative	Site promoted as a Ho	ousing Land Allocation	under Policy MG2	. We also object to th	e Proposals Map on	the same basis	
•				which part of your report of the appointed Insperience		speak to the inspect	or about and why th	ney consider it be ned	cessary to speak at t	the hearing -	

Representor ID and details: 4939/DP4 West Side Ltd			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		nments to be consiered by 'written representations' or do earing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	pes not not meet one or more test(s) of soundr P2 - Unanswered	ness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - L	Jnanswered CE2 - Yes CE3 -	Unanswered CE4 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
	Objectives 4.12	Objective 7	
3b - Do you wish to see any changes made to the Deposit Pla	as a result of your representation? Yes	(If "No" or "Unanswered" - go to	, 3d)
3c - What changes would like to see made to the Deposit Plan			w Or Amended Site: Other (see Notes): answered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amend	ed site, did you submit the site as a Candidate Si Site Name: Land at Constitution Hill	te? Yes (If "Yes", please give	the Candidate Site Name and reference if known) Site Reference: 2419/CS1
3e - Please set out your representation below:			
In the Section headed 'Vision and Objectives', paragraph context, the Older People's Strategy, despite having bee			in the delivery of the priority objectives. However, in this
Objective 7 i.e. "To provide the opportunity for people in of housing to meet the the future needs of the population population. Objective 7 is therefore objected to on this base."	and to create integrated, diverse and sustainable		fers to the need for the LDP to provide a range and choice ention of the need to cater for the growing ageing
3f - Please outline the changes you wish to see made to the I Include reference to an ageing population under Objectiv			
4b - If you wish to speak, please confirm which part of your re In order to present the full case before the appointed Ins		bout and why they consider it be necessary to	speak at the hearing -

Representor ID and details: 4939/DP5 West Side Ltd			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		nts to be consiered by 'written representations' or do session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	pes not not meet one or more test(s) of soundness, P2 - Unanswered	please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Yes CE3 - Una	nswered CE4 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
	3.1		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?		ew Paragraph: Amended Paragraph: New Or unanswered Yes Unanswered	Amended Site: Other (see Notes): ered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Sit Site Name: Land at Constitution Hill		Candidate Site Name and reference if known) te Reference: 2419/CS1
3e - Please set out your representation below:			
The Vale of Glamorgan Community Strategy 2011 to 202 Vale's Older People Strategy. A Priority Outcome in the community Strategy 2011 to 202 Vale's Older People Strategy.	"Planning and Working Together" which, it is st ontext of the latter is that:	ated represents a co-ordinated approach to improv	ring the quality of life in the area and includes the
"Older people are valued and empowered to remain indep	endent, healthy and active. They have equality	opportunity and receive high quality services to m	neet their diverse needs".
It is stated that the LDP will provide a framework which wi	I play an important role in assisting the delivery	of these priority outcomes.	
The following chapter of the Deposit Plan, Section 3, provpeople of retirement age during the Plan Period 2011 to 2		amorgan and, in paragraph 3.5, refers to 2008 popu	ulation projections which point to a 37% increase in
Despite the above, however, the Challenges and Opportuneeds to be managed if the Plan is to meet fully the needs	nities for the LDP, make no reference to the prove of current and future residents in a sustainable	vision of accommodation for the retired and elderly. manner.	We consider that this is one of the factors which
3f - Please outline the changes you wish to see made to the D We would therefore suggest that, as a future 'Focused Ch		ted into paragraph 3.21, which would state that the	LDP will seek to provide a policy framework which:
•Provides adequate levels of accommodation for an agein	g population in appropriate locations which are a	accessible and which offer a good quality environment	ent.
4b - If you wish to speak, please confirm which part of your rep In order to present the full case before the appointed Insp		bout and why they consider it be necessary to spea	ak at the hearing -

Representor ID and details: 4939/DP6 West Side Ltd								
Date Lodged Status Petition and No. Supporting Evidence 27/03/2012 M 0 ✓	Additional SA SEA		Rep format: Comment form		our comments to be cor at a hearing session of			
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered							
	Coherence and Effective			CE2 - Yes		CE4 - Yes		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u> 	Number:	Proposal Map:	<u>Con</u> 	nstraints Map	Appendices:	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Yes	(If	"No" or "Unanswered'	" - go to 3d)			
3c - What changes would like to see made to the Deposit Plan	New Policy: Unanswered	Amended Policy: Yes	New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended S Unanswered	Other (see No Unanswered	otes):	
	Notes:							
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name: Land at C		Site? Yes	(If "Yes", plea	se give the Candidate S Site Reference		rence if known)	
3e - Please set out your representation below: Policy SP1 – The Strategy in general terms provides a ba on the previous sections of the Plan.	sis for the overarching f	ramework of the Plan.	However, we object	ct on the grounds that i	more specific wording is	required in order t	o reflect our comments	
3f - Please outline the changes you wish to see made to the D Consequently Criterion1 of the Policy should be expanded		ound (if relevant)						
"Providing a range and choice of housing to meet the nee	ds of all sectors of the	ommunity including ne	eds associated wit	th an ageing populatior	า."			
4b - If you wish to speak, please confirm which part of your re		speak to the inspecto	r about and why the	ey consider it be neces	ssary to speak at the hea	aring -		

(ordered by Representation ID No.)

Representor ID and details: 4940/DP1	Gwyn John							
Date Lodged Status Petition and No. Status 31/03/2012 M □ 0	upporting Evidence	Additional SA SEA		Rep format: Email	, ,	our comments to be cor at a hearing session of	,	•
2a - Do you consider the LDP is Sound? U	F	Procedural Tests -	P1 - Unanswered	P2 - Unans	t one or more test(s) of swered wered C3 - Unansy			nat it fails.
	(Coherence and Effecti	iveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswere	d
3a - Which part of the Deposit Plan are you	-	Policy Number: MG2(15)	<u>Paragraph</u>	n Number:	Proposal Map:	<u>Con</u> 	straints Map	Appendices:
3b - Do you wish to see any changes made	to the Deposit Plan a	as a result of your repr	resentation? Unansv	vered (li	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made t	o the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended S Unanswered	Other (see No Unanswered	<u>:es):</u>
3d - If your representation relates to a new,		I site, did you submit t Site Name:	he site as a Candidate	Site? Unanswe	red (If "Yes", pleas	se give the Candidate S Site Reference		ence if known)
0 0								

3e - Please set out your representation below:

Vale of Glamorgan Development Plan 2011 -2026 - Deposit Plan

I refer to the contents of the Plan with reference to Land to the rear of Heol-y-Felin Estate, Llantwit Major MG 2 [15].

I am extremely surprised that your Officers have decided to include this site on the Plan albeit as a Reserve Site which would be included after 2020 pending the outcome of other sites being developed.

The land in question is a greenfield site which forms part of the countryside and within the boundaries of the Heritage coast. The natural beauty of the area encourages wildlife and building on this land would contravene Welsh Government Biodiversity principles.

The plan offers a potential access from Nant yr Adar, which is substandard creating danger to public safety and all residents living within the estate.

The amount of traffic that could be generated from this site, if built, would be in the region of 800 vehicles, all of which would descend on Ham Lane East, the entrance of which is within the safe routes to communities, 20mph zone which houses three schools, a Church, Leisure Centre and is adjacent to a Housing Estate. The area is currently extremely busy and at peak periods sees over 1400 children going to and leaving schools on the route. It is absolute madness to encourage more development on this route.

During the development there would be mayhem, increasing disturbance, pollution and most of all danger to public safety.

The main river flowing through the site is the River Hodnant, not a brook as referred to in the plan, but a main river which has caused flooding in the nearby Ham Manor residential site on more than one occasion. I have in fact witnessed the flooding myself at 3.30am when I worked through the night helping residents stop the water from entering their homes — it is certainly not a brook!

The area is within a flood plain and development of this proportion would certainly bring huge flooding to the area.

I will now bring to your attention of the impact this development would have on existing infrastructure within the Town. Firstly, Llantwit Major is not as fortunate as nearby Towns to have a Health Centre, we have a small clinic and a surgery but they are stretched to manage the patients of our Town and villages.

Our schools could not manage the extra pupils which would arise from this development and the whole structure of our education facilities would need updating. Llantwit Major has a small Youth Centre which is now open three nights of the week due to cuts in youth funding by the Council, as a result we currently have many problems with youth annoyance and issues of youths hanging around the Town with nothing to

(ordered by Representation ID No.)

Representor ID and details: 4940/DP1 Gwyn John

do and nowhere to go.

Another issue arises with the substandard Public Transport serving the Town, public confidence is at rock bottom as many people continue to use cars rather than risk a bus or train not turning up. One bus company provides vehicles which are in a dreadful state and have let down many residents by failing to turn up on time. The car will always be turned to if the public have no confidence in their public transport.

Throughout the years, Llantwit Major has been developed and left without the infrastructure — residents of Llantwit Major will not accept this to happen in the future. The Town in the eighties was a developers paradise, yes we do need some homes as constructed by Hafod on the Boverton Road and carry the criteria to be rented to people with local connections, but certainly not the private estates of expensive houses which will be planned for this site.

Llantwit Major cannot sustain large development until the infrastructure is in place and that all applications meet the criteria which this recommendation does not. I want to see this site withdrawn from the Plan and if you want to include alternative sites, I suggest that your Officers start looking off the A48 within the Vale of Glamorgan boundary to build the houses demanded by the Welsh Government.

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



Representor ID and details: 4941/DP1 LS Healthcare Gr	oup, Harlech Court						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform	, ,		be consiered by 'writter sion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		d does not not mee P2 - No	et one or more test(s) of	soundness, plea	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 -	No	
	Coherence and Effect	iveness Tests - CE1	- No	CE2 - Yes	CE3 - No		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:		Constraints Map	Appendices:
	MG22(1)	7.95		MG22			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan		Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Ame	ended Site: Other (see I	Notes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit s Site Name:	the site as a Candidate	Site? No	(If "Yes", plea	J	didate Site Name and reference:	ference if known)
3e - Please set out your representation below:							
The representor does not disagree with the thrust of the C specifically to the tongue of land designated as GW between							presentation relates
It is considered that this part of the designation is unsoun	d for the following reas	ons:					
 it has not been demonstrated in the LDP that normal de- only land that is strictly necessary to fulfil the purpose of part of the land may be needed to fulfil the purposes of were the tongue of land excluded, the remaining designate 	the policy should be in bolicy MG 11 (2)	ncluded		iion			
3f - Please outline the changes you wish to see made to the D That the tongue of land designated as GW between the la proposed GW.			expansion of Lland	ough Hospital under po	licy MG 11 (2) ar	nd Penlan Road (B4267)	be deleted from the
4b - If you wish to speak, please confirm which part of your rep	oresentation you wish t	o speak to the inspecto	or about and why t	hey consider it be neces	ssary to speak at	the hearing -	

Representor ID and details: 4941/DP2 LS Healthcare G	oup, Harlech Court						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	P1 - No	P2 - No) that it fails.
	1	C1 - Yes		C3 - No CE2 - Yes	C4 - CE3 - No	No CE4 - No	
		iveness resis - CET	- INO 	CEZ - Yes	CE3 - NO		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	<u>Number:</u>	Proposal Map:		Constraints Map	Appendices:
	MG11	7.47		MG11			
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your rep		(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan			New Paragraph:	Amended Paragrap	oh: New Or Ame	ended Site: Other (see N	Notes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site? No	(If "Yes", plea	•	didate Site Name and ref	rerence if known)
3e - Please set out your representation below: The representor does not disagree with the thrust of policing related uses'. Such services may include direct health cases 800 persons.							
The LDP is unsound in the following terms:							
- provision for the future requirements of Llandough Hosp account has been taken in land use terms that the private						nd already in the public s	sector's ownership; no
-the plan is insufficiently flexible to allow for the prospects this respect	s of allowing further dev	relopment of services at	Llandough Hosp	ital, and insufficient con	sideration has be	een given to how the priv	ate sector could assist in
3f - Please outline the changes you wish to see made to the D		,	a danimatian MO	20 (4) The sharpes th			2 44 decimation
This representation should be read in conjunction with the eastwards to Penlan Road (B4267) or to include in the suallow hospital related uses on the land, subject to adequate	pporting text to the poli	cy sufficient flexibility to	allow for the pros	spect that should the ne	eed arise during the	e either to extend the MC ne plan period considera	tion would be given to
4b - If you wish to speak, please confirm which part of your re	presentation you wish t	o speak to the inspecto	r about and why t	hey consider it be neces	ssary to speak at	the hearing -	

Representor ID and details: 4942/DP1 Mr Stanley R Gilb	ert						
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		Rep format: Eform	, ,	,	be consiered by 'written resion of Public examination'	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound a	nd does not not me	et one or more test(s) o	f soundness, plea	ase indicate which test(s) th	at it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	tiveness Tests - CE	1 - No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragra	aph Number:	Proposal Map:		Constraints Map	Appendices:
	SP7(1)	5.55 - 1	Fransport	SP7(1)		Ancient and Semi Natural Woodland	Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your rep	resentation? Yes		If "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	ph: New Or Ame	ended Site: Other (see Not	<u>es):</u>
	Notes:	110			100	110	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name: Model Fa		ate Site? Yes	(If "Yes", plea	•	didate Site Name and reference: 2501/CS.1	ence if known)
3e - Please set out your representation below: Local resident and frequent user of the train service from	Llantwit Major.						
 3f - Please outline the changes you wish to see made to the D 1) There is no strong case for this development which constated that access by road or rail is not an important issue only be described as tortuous. 2) There are serious questions as to whether there is sufficient is the hourly frequency which if doubled would att 3) The route appears to be environmentally damaging with 	id divert already scarce for them with regards icient line capacity for tract greater usage thus	e funds from upgradito use of their facilities this service with participation of the reducing car journey	es; this is reinforced cular regard to the f ys.	I by the success of Bris	tol which has no	rail access and a road acce	ss which at best can
4b - If you wish to speak, please confirm which part of your re	oresentation you wish t	o speak to the inspe	ctor about and why	hey consider it be nece	ssary to speak a	t the hearing -	

Representor ID and details: 4943/DP1 Taylor Wimpey S	trategic Land						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA ✓		Rep format: Comment forn			consiered by 'written of Public examinatio	representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that th Procedural Tests - Consistency Tests - Coherence and Effecti	P1 - Unanswered C1 - Unanswered	P2 - Unans C2 - Unans	of one or more test(s) of swered considered C3 - Unans CE2 - Yes	· ·	answered	that it fails.
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: 48	<u>Paragraph</u>	Number:	Proposal Map:	9	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	resentation? Yes	(l [.]	f "No" or "Unanswered"	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amende Unanswered	ed Site: Other (see N Yes	lotes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit tl Site Name: Land Off I		Site? Yes	(If "Yes", plea	•	te Site Name and refe ence: 2593/CS1 (Alte	erence if known) ernative Site excludes sou
3e - Please set out your representation below: Policy MG1 (Housing Supply in the Vale of Glamorgan), vobject to either of these sites, we consider that further fle Furthermore, the sites held in reserve, if they emerge as application procedures and provision of necessary infrast Policy MG1 is therefore objected to on the grounds that the Cartesian Supplication Document, together with Appendix 1.	xibility should be introdu a result of a future revie ructure. This may also a ne flexibility allowance s	w of the Plan on the w of the Plan, may be apply to other sites programmed be increased to a	basis that a large unlikely to be deve grammed later in the 15% in order to all	proportion of the sites r elopable in their entirety the Plan period, includin	may not come forwar within the Plan perion og sites occupied by	d at the densities pro od, given the likely tim current uses such as	posed. nescale for planning the HTV studios.
3f - Please outline the changes you wish to see made to the D The flexibility allowance should be increased to 15% in or			nd therefore to ma	ke provision for 11,450	units.		
4b - If you wish to speak, please confirm which part of your re We would wish to speak at the relevant hearing sesions i		·	•	•	ssary to speak at the	hearing -	
We wish to speak in order to put the points across fully to	the Inspector and addr	ess any points he wish	es to raise regard	ing the supporting evide	ence.		

Representor I	ID and d	letails:	4943/DI	P2 Taylor Wimpey St	trategic Land						
Date Lodged 02/04/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Comment forn	·	,	to be consiered by 'writte ssion of Public examina	en representations' or do tion? Examination
2a - Do you co	onsider th	ne LDP	s Sound?	Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - Unanswered	d does not not mee P2 - Unans	` '	of soundness, ple	ease indicate which test(s) that it fails.
					Consistency Tests -	C1 - Unanswered	C2 - Unans	swered C3 - Una	answered C4	- Unanswered	
					Coherence and Effect	iveness Tests - CE1	- Unanswered	CE2 - Yes	CE3 - Unansv	vered CE4 - Yes	
3a - Which par	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
					49			Yes			
3b - Do you wi	sh to se	e any ch	anges ma	de to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswei	ed" - go to 3d)		
3c - What cha	nges wo	uld like 1	o see mad	le to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Yes	New Paragraph: Unanswered	Amended Parac Unanswered	raph: New Or Am Yes	nended Site: Other (see Unanswere	
					Notes:						
3d - If your re	presenta	ation rela	ites to a ne		ed site, did you submit Site Name: Land Off			(If "Yes", p	•	ndidate Site Name and re Reference: 2593/CS1 (A	eference if known) Iternative Site excludes sou
3e - Please se	et out yo	ur repre	sentation b	pelow:				-			
					ch Taylor Wimpey are ject to the non-inclusio					delivered in an early pha	ase of the Plan period
(See atta	ached Su	ubmissic	n Docume	nt, together with Appe	ndices which include a	Sustainability Apprais	al).				
		-	,		eposit Plan to make it on MG2(7) as an addit	,	vould provide for pl	hased, comprehensi	ve growth over the	Plan period.	
•					presentation you wish t relating to housing nur		•	•	cessary to speak a	at the hearing -	
We wish	to speal	k in orde	r to put the	e points across fully to	the Inspector and add	ress any points he wis	hes to rasie regard	ing the supporting ev	vidence.		

Representor ID and details: 4943/DP3 Taylor Wimpey S	trategic Land						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		Rep format: Comment for			to be consiered by 'writter ession of Public examinati	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests - Consistency Tests - Coherence and Effect	P1 - Unanswered C1 - Unanswered	P2 - Unans	swered	nswered C4	ease indicate which test(s 1 - Unanswered wered CE4 - Yes) that it fails.
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	oh Number:	Proposal Map: Yes	7	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	aph: <u>New Or Ar</u> Yes	mended Site: Other (see I Unanswere	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name: Land Off			(If "Yes", ple	ū	andidate Site Name and re Reference: 2593/CS1 (Alt	ference if known) ernative Site excludes sou
3e - Please set out your representation below: The Candidate Site Assessment states that "the developr significant wedge of countryside, would remain to separat necessary to fulfil the purposes of the policy" (paragraph provided by Cwm Ciddy Lane. The inclusion of the Alternative Site within a Green wedge (See attached Submission Document, together with Appe	e the two urban areas. 4.7.12). It goes on to st e under Policy MG22 is	Advice in Planning Poate that clearly identifit therefore objected to.	olicy Wales aims to able physical featu	ensure that "in definir	ng green wedges	s it is important to include	only land that is strictly
3f - Please outline the changes you wish to see made to the D Remove the site identified from the proposed Green Wed	· ·	,	e.				
4b - If you wish to speak, please confirm which part of your rep We would wish to speak at the relevant hearing sessions We wish to speak in order to put the points across fully to	relating to Green Wedg	ge issues.	·	·		at the hearing -	

Repre	sentor	ID and	details:	4943/D	P4 Taylor Wimpey St	rategic Land						
	odged 4/2012		Petiti	on and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Comment forr	1	,	e consiered by 'writte on of Public examinat	en representations' or do tion? Examination
2a - D	o you co	onsider t	he LDP	is Sound?	Sound	2b - If you think that the Procedural Tests -	ne Plan is unsound an P1 - Unanswered		et one or more test(s) o swered	f soundness, please	indicate which test(s	s) that it fails.
						Consistency Tests -	C1 - Unanswered	C2 - Unans	swered C3 - Unan	swered C4 - U	Inanswered	
						Coherence and Effect	tiveness Tests - CE1	I - Unanswered	CE2 - Unanswered	CE3 - Unanswere	ed CE4 - Unansw	vered
3a - W	/hich pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:	Paragrap	oh Number:	Proposal Map:		Constraints Map	Appendices:
						49			MG2(7)			
3b - D	o you w	ish to se	ee any cl	nanges ma	de to the Deposit Plan	as a result of your rep	resentation? No	(1	f "No" or "Unanswered	<mark>l" -</mark> go to 3d)		
3c - W	/hat cha	nges wo	ould like	to see mad	de to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Amend Unanswered	ded Site: Other (see Unanswere	
						Notes:						
3d - I	f your re	present	ation rel	ates to a ne	ew, deleted or amende	•	the site as a Candidate acent to Port Road W		` '	J	ate Site Name and re	eference if known)
		•		esentation l d allocation	below: n MG2(7) - Land to the	South west of Weycoo	ck Cross, Barry.		,			
			_	es you wish oove alloca	n to see made to the Detion.	eposit Plan to make it	sound (if relevant)					
	•				n which part of your rep vant hearing sessions	•		•	hey consider it be nece phasing.	ssary to speak at th	e hearing -	
,	Ne wish	to resp	ond dire	ctly before	the Inspector to any of	piectors who may be p	resent.					

Representor ID and details: 4943/DP5 Taylor Wimpey St	rategic Land
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:
	MG2(7). Delivery and
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	 New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Yes
	Notes:
3d - If your representation relates to a new, deleted or amende	ord site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Land Adjacent to Port Road West, Weycock Cross, Barry Site Reference: 2427/CS1
3e - Please set out your representation below:	
	ng the latter phases of the Plan i.e. Phases 2 and 3. Although it is stated that the phasing specified is indicative, the likelihood is that the site will be ilder interest exists. Once the LDP is adopted in approximately 18 months to 2 years time, and a planning application approved, there would be no
3f - Please outline the changes you wish to see made to the Di The allocated site MG2(7) should be identified as being ca	eposit Plan to make it sound (if relevant) apable of development in Phases 1 and 2 of the Plan period rather than Phases 2 and 3.
	oresentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - relating to the allocated housing development and its proposed phasing.
We wish to respond directly before the Inspector to any of	piectors who may be present

Representor ID and details: 4944/DP1 Gareth Price							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			be consiered by 'written sion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound and P1 - No	d does not not mee P2 - No	et one or more test(s) of	f soundness, pleas	se indicate which test(s)	that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	tiveness Tests - CE1	- No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(13)			MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	ph: New Or Ame	nded Site: Other (see N	lotes):
	Yes	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	•	the site as a Candidate he west and east of St		(If "Yes", plea	-	idate Site Name and ref ference: 2446/CS1 and	•
3e - Please set out your representation below:							
The proposed development is on an inappropriate greenf	eld site that is a specia	al landsca <mark>pe</mark> area on th	e edge of Cowbrid	dge and should not be th	ne first option for a	any additional housing.	
St Athan Road is narrow and, even if widened or realigne narrower areas when heading away from Cowbridge towards.							
There are already significant pressures on parking in Cow which would only increase with the building of new house		even before the separa	e proposals to bui	ild on the cattle market	(which currently a	cts as an informal car pa	ark for the town) all of
Bont Faen Primary School is already oversubscribed, and	I the building of new fa	mily homes would wors	sen the situation.				
Other facilities in the town, for example the GPs at the He	ealth Centre, would also	o be stretched.					
3f - Please outline the changes you wish to see made to the D							
Keep the proposed site as a special landscape area and	remove it as a candida	te site.					
Keep the boundary of Cowbridge as it is currently, as this	is greenfield						
4b - If you wish to speak, please confirm which part of your re	presentation you wish t	to speak to the inspect	or about and why t	they consider it be nece	ssary to speak at	the hearing -	

Representor ID and details: 4945/DP1 Bethan Wilcox							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	e Additional SA SEA		Rep format: Eform	you want to	,	nts to be consiered by 'writte g session of Public examina	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -					, please indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 -	No	C4 - No	
	Coherence and Effect	ctiveness Tests - CE	1 - No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:		ph Number:	Proposal Map:		Constraints Map	Appendices:
	MG7						
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your re	presentation? No	(swered" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan		Amended Policy: No	New Paragraph: No			Amended Site: Other (see	
	Notes:						
3d - If your representation relates to a new, deleted or amend	ed site, did you submit Site Name:	the site as a Candidat	e Site? No	(If "Ye		Candidate Site Name and rete Reference:	eference if known)
3e - Please set out your representation below:							
The land proposed for the development in St. Nicholas is	a greenfield site and v	would result in urbanisa	ation of the country	rside.			
A development of this size would overwhelm our village.							
A dense development of 8.5 houses to an acre, incluing	roads, is out of charact	ter with a conservation	area village.				
The village does not have services such as - a shop, posparticularly relevant to residents of affordable housing. T november 2010.							
The proposed development conflicts with council policy (appropriate to accomodate additional residential develop		evelopment within mine	or rural settlements	s. The council's h	ighway engineers h	nave advised that access fro	m ger-y-llan is not
Problems and dangers to/from a new junction on the A44	and the effect on traff	ic flow, particularly at p	peak periods.				
Effect of increased traffic from the new developments (in	cluding cowbridge) on	congestion at peak mo	orning period on the	e A48 and at bott	lenecks at tesco ju	nction and culverhouse cros	S.
New houses should be built on brown land and not on gr	een field sites.						
Would have an impact on the wildlife of the village, destr	oying habitat.						
Would have an impact on the wildlife of the village, destr		sound (if relevant)					

(ordered by Representation ID No.)

Set Lodge Setting Petition and No. Supporting Evidence Setting S	epresentor ID and	details	: 4946/D	P1 Sean Good							_
2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - No P2 - No Consistency Tests - C1 - No C2 - No C3 - No C4 - No Coherence and Effectiveness Tests - CE1 - No C2 - Yes CE3 - No CE4 - No Ceremonal of Effectiveness Tests - CE1 - No C2 - Yes CE3 - No CE4 - No No Ceremonal of Effectiveness Tests - CE1 - No C2 - Yes CE3 - No CE4 - No Constraints Map Appendices: MG2(19)	ate Lodged Statu	s Petit	tion and No.	Supporting Evidence	Additional SA SEA		Rep format:				
2b - If you think that the Plan is unsound and does not not meet end one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests Procedural	27/03/2012 M		0				Eform				
Consistency Tests * C1 * No C2 * No C3 * No C4 * No C6 * No	a - Do you consider	the LDF	is Sound?	Unsound							
Coherence and Effectiveness Tests - CE1 - No CE2 - Yes CE3 - No CE4 - No a - Which part of the Deposit Plan are you commenting on? b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Yes (If 'No' or "Unanswered" - go to 3d) b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Yes (If 'No' or "Unanswered" - go to 3d) c - What changes would like to see made to the Deposit Plan? No No No No No No No No No No No No No No No Site Name: 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? No (If 'Yes', please give the Candidate Site Name and reference if known) Site Name: 3e - Please set out your representation below: I strongly object to the LDP for the following reasons: Increased Traffic Congestion The LDP will allow creation of almost 5,000 new houses in a relatively small geographical area, including: Barry (3,052), Penarth (600), Sully (650), Dinas Powys (400) and Llandough (170), Many of the new residents are likely to travel to Cardiff by car on a frequent basis and this will increase pressure on the current road network generally, and in particular on the A4055 through Dinas Powys, and Merrie Harrier Baron's Courl junctions. Currently both these junctions cause excessive congestion during the busy periods and appear to be operating at capacity (if not beyond). Insufficient Access to the Murch Current access to the Murch Current access to the Murch School are parked along Murch Road. Increased Air Pollution The increased Air Pollution The increase a inslow moving/stationary traffic on the A4055 is bound to raise the level of air pollution and have a harmful effect on children in Murch School which is immediately adjacent to the A4055. Road Safety											
Coherence and Effectiveness Tests - CE1 - No CE2 - Yes CE3 - No CE4 - No An Which part of the Deposit Plan are you commenting on? Policy Number: MG2(19)					Consistency Tests -	C1 - No	C2 - No	C3 - No	C4		
As a Which part of the Deposit Plan are you commenting on? MG2(19)					Coherence and Effec	tiveness Tests - CE ²	1 - No	CE2 - Yes	CE3 - No	CE4 - No	
bb - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d) bb - Do you wish to see any changes made to the Deposit Plan? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): No N	a - Which part of the	e Depos	it Plan are y	ou commenting on?							
to - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d) to - What changes would like to see made to the Deposit Plan? No Yes No					MG2(19)						
New Policy: No No Notes: New Policy: No No Notes: No No Notes: No No Notes: No No	o - Do you wish to s	see any (" - go to 3d)		
No Yes No											
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Reference: 3e - Please set out your representation below: I strongly object to the LDP for the following reasons: Increased Traffic Congestion The LDP will allow creation of almost 5,000 new houses in a relatively small geographical area, including: Barry (3,052), Penarth (600), Sully (650), Dinas Powys (400) and Llandough (170). Many of the new residents are likely to travel to Cardiff by car on a frequent basis and this will increase pressure on the current road network generally, and in particular on the A4055 through Dinas Powys, and Merrie Harrier Baron's Court junctions. Currently both these junctions cause excessive congestion during the busy periods and appear to be operating at capacity (if not beyond). Insufficient Access to the Murch Current access to the Murch side of Dinas Powys is barely adequate, being via Murch Road or the narrow bridge at Bryn-Y-Don. Long tailbacks are commonplace particularly when cars dropping off and collecting children at Murch School are parked along Murch Road. Increased Air Pollution The increase in slow moving/stationary traffic on the A4055 is bound to raise the level of air pollution and have a harmful effect on children in Murch School which is immediately adjacent to the A4055. Road Safety	· ·			·	· ·	Yes	No	No	No	No	
Site Name: Site Name: Site Reference: 3e - Please set out your representation below: I strongly object to the LDP for the following reasons: Increased Traffic Congestion The LDP will allow creation of almost 5,000 new houses in a relatively small geographical area, including: Barry (3,052), Penarth (600), Sully (650), Dinas Powys (400) and Llandough (170). Many of the new residents are likely to travel to Cardiff by car on a frequent basis and this will increase pressure on the current road network generally, and in particular on the A4055 through Dinas Powys, and Merrie Harrier Baron's Court junctions. Currently both these junctions cause excessive congestion during the busy periods and appear to be operating at capacity (if not beyond). Insufficient Access to the Murch Current access to the Murch School are parked along Murch Road. Increased Air Pollution The increase in slow moving/stationary traffic on the A4055 is bound to raise the level of air pollution and have a harmful effect on children in Murch School which is immediately adjacent to the A4055. Road Safety					Notes:						
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Baron's Court junctions. Currently both these junctions cause excessive congestion during the busy periods and appear to be operating at capacity (if not beyond). Insufficient Access to the Murch Current access to the Murch side of Dinas Powys is barely adequate, being via Murch Road or the narrow bridge at Bryn-Y-Don. Long tailbacks are commonplace particularly when cars dropping off and collecting children at Murch School are parked along Murch Road. Increased Air Pollution The increase in slow moving/stationary traffic on the A4055 is bound to raise the level of air pollution and have a harmful effect on children in Murch School which is immediately adjacent to the A4055. Road Safety	The LDP will al	llow creat	tion of almo	st 5,000 new houses in	n a relatively small ged	ographical area, includ	ing: Barry (3,052),	Penarth (600), Sully (65	0), Dinas Powys	(400) and Llandough (1	70). Many of the new
Current access to the Murch side of Dinas Powys is barely adequate, being via Murch Road or the narrow bridge at Bryn-Y-Don. Long tailbacks are commonplace particularly when cars dropping off and collecting children at Murch School are parked along Murch Road. Increased Air Pollution The increase in slow moving/stationary traffic on the A4055 is bound to raise the level of air pollution and have a harmful effect on children in Murch School which is immediately adjacent to the A4055. Road Safety	residents are lil Baron's Court j	kely to tra unctions	avel to Card . Currently b	diff by car on a frequent both these junctions ca	t basis and this will incuse excessive conges	rease pressure on the tion during the busy pe	current road netwo	ork generally, and in par o be operating at capac	ticular on the A4 city (if not beyone	055 through Dinas Powyd).	s, and Merrie Harrier
Current access to the Murch side of Dinas Powys is barely adequate, being via Murch Road or the narrow bridge at Bryn-Y-Don. Long tailbacks are commonplace particularly when cars dropping off and collecting children at Murch School are parked along Murch Road. Increased Air Pollution The increase in slow moving/stationary traffic on the A4055 is bound to raise the level of air pollution and have a harmful effect on children in Murch School which is immediately adjacent to the A4055. Road Safety	Insufficient Acc	ess to th	ne Murch								
The increase in slow moving/stationary traffic on the A4055 is bound to raise the level of air pollution and have a harmful effect on children in Murch School which is immediately adjacent to the A4055. Road Safety	Current access	to the M	/lurch side o			Murch Road or the nai	row bridge at Bryn	Y-Don. Long tailbacks	are commonplad	e particularly when cars	dropping off and
Road Safety	Increased Air F	ollution									
	The increase in	ı slow mo	oving/statio	nary traffic on the A405	55 is bound to raise the	e level of air pollution a	and have a harmful	effect on children in Mu	irch School whic	h is immediately adjacer	nt to the A4055.
The Council acknowledges the safety issues associated with the overloaded A4055. The additional traffic generated by the proposed housing is bound to lead to an increase in road traffic accidents.											
	The Council ac	knowled	ges the safe	ety issues associated v	vith the overloaded A4	055. The additional tra	iffic generated by the	ne proposed housing is	bound to lead to	an increase in road traff	ic accidents.
Loss of Green Belt Land											
Part of the proposed housing on the current St Cyres School site is on 'green belt' land and will have an adverse impact on the ecology of the area.	Part of the prop	osed ho	ousing on the	e current St Cyres Sch	ool site is on 'green be	elt' land and will have a	n adverse impact o	on the ecology of the are	ea. 		
3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)	f - Please outline th	he chanç	ges you wisl	n to see made to the D	eposit Plan to make it	sound (if relevant)					
I believe the Council should consider utilising the existing St Cyres School building (Dinas Powys Site) for the relocation of Murch Junior & Infants Schools. This would have two advantages:	I believe the Co	ouncil sh	ould consid	er utilising the existing	St Cyres School buildi	ing (Dinas Powys Site)	for the relocation of	of Murch Junior & Infant	s Schools. This	would have two advanta	ges:
1. Pupils would be more remote from airborne pollution generated by traffic using the A4055.											

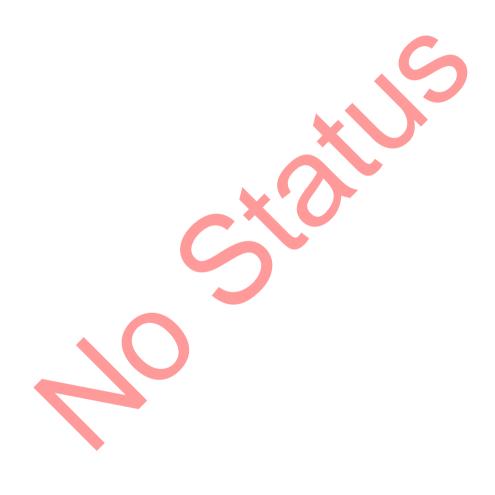
No part of the plan affecting Barry, Dinas Powys, Sully, Penarth and Llandough should be implemented until such time as transport infrastucture improvements have been planned and constructed, otherwise

(ordered by Representation ID No.)

Representor ID and details: 4946/DP1 Sean Good

unacceptable levels of congestion on the A4055 and it's junctions at the Merrie Harrier and Barons Court will result.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - I wish to speak to the Inspector about all issues raised in Section 3e to ensure my views (and those of neighbours I have recently spoken to) are expressly made known to him or her.



Representor ID and details: 4948/DP1 Julie Thompson							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	,		oe consiered by 'writter on of Public examination	n representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that th Procedural Tests -	ne Plan is unsound and P1 - Yes	d does not not mee P2 - No	et one or more test(s) of	f soundness, pleas	e indicate which test(s)) that it fails.
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 - \	⁄es	
	Coherence and Effecti	iveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(19)						
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your repr	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	oh: New Or Amen	ded Site: Other (see N	Notes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	he site as a Candidate	Site? No	(If "Yes", plea	ase give the Candid Site Refe	date Site Name and reference:	ference if known)
3e - Please set out your representation below:				,			
The LDP suggests that access to the MG2 site will be thr where even the gritters do not make it up, and it often because of the contract of th							
3f - Please outline the changes you wish to see made to the D Removal of Windyridge as a potential access road from the	•	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your re	oresentation you wish to	speak to the inspecto	or about and why tl	ney consider it be nece	ssary to speak at tl	he hearing -	

Representor ID and details:	4948/DI	P2 Julie Thompson							
Date Lodged Status Petiti 02/04/2012 M	on and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Eform			be consiered by 'writte sion of Public examinati	
2a - Do you consider the LDP	is Sound?	Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound ar P1 - Yes	nd does not not med P2 - No	et one or more test(s) o	of soundness, plea	se indicate which test(s) that it fails.
			Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 -	Yes	
			Coherence and Effect	tiveness Tests - CE	1 - No	CE2 - No	CE3 - No	CE4 - Yes	
3a - Which part of the Deposit	t Plan are y	ou commenting on?	Policy Number:	<u>Paragra</u>	ph Number:	Proposal Map:		Constraints Map	Appendices:
			MG2(19)	7.8					
3b - Do you wish to see any o	hanges mad	de to the Deposit Plan	as a result of your rep	presentation? Yes	(If "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like	to see mad	e to the Deposit Plan?	New Policy:	Amended Policy: Yes	New Paragraph: No	Amended Paragra No	<u>New Or Ame</u> Yes	nded Site: Other (see No	Notes):
			Notes:						
3d - If your representation re	ates to a ne	w, deleted or amende	d site, did you submit Site Name:	the site as a Candida	te Site? No	(If "Yes", ple	•	lidate Site Name and re	ference if known)
3e - Please set out your repr	esentation b	elow:							
I note in the report that a use public transport very children/teenagers to a Powys. My son has trav	often, but i seat (should	my son and daughter of l be 2), no-one wears a	use it often. Last weel a seatbelt, and there a	k, my dau <mark>gh</mark> ter told m ire over 20 people sta	e she would prefer nding. This is without	to walk to Stanwell Schout the additional house	ool in future and t	he buses cram so many	people on., There are 3
3f - Please outline the chang	es you wish	to see made to the Do	eposit Plan to make it	sound (if relevant)					
The changes I wish to so this will reduce the poten				developing further ho	ousing. The site at t	the top of Murch Cresc	ent should be use	d for the much needed o	community resources and
4b - If you wish to speak, ple	ase confirm	which part of your rep	resentation you wish t	to speak to the inspec	tor about and why t	thev consider it be nece	essarv to speak at	the hearing -	

Representor ID and details: 4948/DP3 Julie Thompson							
Date Lodged 02/04/2012Status MPetition and No. Design on the supporting Evidence Output02/04/2012M0	Additional SA SEA		Rep format: Eform	, ,		be consiered by 'writter sion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests - Consistency Tests -	P1 - Yes	does not not mee P2 - No C2 - No	et one or more test(s) of C3 - No	soundness, plea	se indicate which test(s) that it fails.
	Coherence and Effec	tiveness Tests - CE1	- No	CE2 - Yes	CE3 - No	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19)	<u>Paragrapl</u> 5.6	n Number:	Proposal Map:)	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation? Yes	(If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Yes Notes:	Amended Policy: No	New Paragraph: No	Amended Paragrap No	h: New Or Ame Yes	nded Site: Other (see No	Notes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site? No	(If "Yes", plea	•	lidate Site Name and ref	ference if known)
3e - Please set out your representation below: If this plan is implemented, I would like to raise my conce make mattters worse. The Dinas Powys Infants school is If the 400+ houses get given the go ahead in Murch Cres over Murch Bridge, or along Longmeadow. With the 200 rush hour, and there is already a black spot at the Merrie	right in the middle of the cent and Caerleon Road onew dwellings on the	the A405 <mark>5 a</mark> nd that road ad area's that will create	recently had a None more NO2, not re	itro Dioxide (NO2) readi educe it. The 400+ hou	ng of 43.8, where se will probable o	the maximum level shore the maximum level shore	ould be no more than 40. Cars traveling either
3f - Please outline the changes you wish to see made to the D In order to ease the situation on the A4055, I would like to school. This would free up the infants school, which could Re: The St Cyres site in Murch Crescent, there are many community base, rather than adding to the traffic problem. Thank you for taking the time to ready my concerns.	o consider that the land d become a new Docto local organisations loc	at the top of Murch Creors surgery. Our present	t surgery is not su	ufficant for the amount of	f people who alre	ady live in Dinas Powys	S.
4b - If you wish to speak, please confirm which part of your re	presentation you wish	to speak to the inspecto	r about and why t	hey consider it be neces	ssary to speak at	the hearing -	

Representor ID and details: 4949/DP1 Dr E.W.Cloutman	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Proposal Map: Constraints Map Appendices:
	89
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan'	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Yes Unanswered
	Notes:
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below:	
Land at Rose Cottage as per the attached plan is required attached in accordance with LDP requirements.	to be included within the Residential Settlement Boundary of the LDP so that it can be put to a beneficial use in future. A sustainability appraisal is
restraint policies. It is thus an area of unkempt wasteland not sound as this is the only land between the dwellings of hedgerow and is visually divorced from the adjacent coun	eate a public recreation ground and playing field. It is too small to be put to use as a paddock or any other beneficial rural land use consistent with rural that has been created artificially through the creation of the playing field and has been sterilised as a result of the CPO. In its current form the LDP is Lantwit Major Road and the recreation ground that has not been included within the settlement boundary. It is bounded by a track and tree-lined ryside. The Council has failed to adequately assess the existing character and form of development at this part of the village. The settlement boundary of a robust and credible evidence base in line with soundness test CE2.
There are three points of access onto the Llantwit major F	ke the plan sound and will help to contribute towards opportunities for meeting the ambitious windfall housing requirement identified under policy MG1. load with the best available option adjacent to Myrtle Cottage. With the inclusion of the land required for this access the site has the potential to yield in hits, within the Primary Settlement consistent with the plan strategy.
3f - Please outline the changes you wish to see made to the D The "left over" CPO land at Rose Cottage located betwee plan.	eposit Plan to make it sound (if relevant) In the existing housing and recreation ground to be included within the residential settlement boundary of St. Athan under policy MG6, as per the attached
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Represent	or ID and	details	4950/D	P1 Concerned Cowbr	ridge and Llanblethian	Residents					
Date Lodge	ed Status M	Petit	ion and No. 498	Supporting Evidence	Additional SA SEA		Rep format: Comment form		your comments to be at a hearing session	•	n representations' or do on? Examination
2a - Do you	ı consider	the LDF	is Sound?		2b - If you think that the Procedural Tests -	he Plan is unsound and de P1 - Unanswered	pes not not meet or P2 - Yes	ne or more test(s) o	f soundness, please ii	ndicate which test(s)) that it fails.
					Consistency Tests -	C1 - Unanswered	C2 - Unanswe	red C3 - Unan	swered C4 - Una	answered	
					Coherence and Effec	tiveness Tests - CE1 - \	′es Cl	E2 - Yes	CE3 - Unanswered	CE4 - Unanswe	ered
3a - Which	part of the	Depos	it Plan are y	ou commenting on?	Policy Number:	Paragraph N	Number: Pr	roposal Map:	<u>Q</u>	Constraints Map	Appendices:
					62			MG2(13)			
3b - Do you	u wish to s	ee any o	changes ma	de to the Deposit Plan	as a result of your rep	presentation? Yes	(If "N	lo" or "Unanswered	l" - go to 3d)		
3c - What	changes w	ould like	to see mad	de to the Deposit Plan?	New Policy: Unanswered		ew Paragraph: Inanswered	Amended Paragra Unanswered	ph: New Or Amende Yes	d Site: Other (see Note of the Control of the Contr	
					Notes:						
3d - If you	r represen	tation re	lates to a n	ew, deleted or amende		the site as a Candidate Si East/West of St Athan Ro	, v <i>-</i> =	(If "Yes", plea	ase give the Candidat Site Refere		ference if known) 46/CS2, 2451/CS2 (part),
	,		esentation description descrip	below: llocation as per the atta	ached statement and r	esidents' petition.					
			jes you wish ousing site N	n to see made to the Do MG2 (13).	eposit Plan to make it	sound (if relevant)					
,		· ·		' '	,	to speak to the inspector a	, ,		, ,	U	

Representor ID and details: 4950/DP2 Concerned Cowb	ridge and Llanblethian	Residents					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form			e consiered by 'written on of Public examination	representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound and d P1 - Unanswered	oes not not meet o	one or more test(s) of	soundness, please	indicate which test(s)	that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	ered C3 - Unans	wered C4 - U	nanswered	
	Coherence and Effect	iveness Tests - CE1 - \	Yes C	CE2 - Yes	CE3 - Unanswere	d CE4 - Unanswe	ered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph I	Number: F	Proposal Map:		Constraints Map	Appendices:
				MG21(2)			
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your rep	resentation? Yes	(If "	No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy: N	lew Paragraph:	Amended Paragrap	h: New Or Amend	led Site: Other (see N	Notes):
-	Unanswered	Unanswered L	Jnanswered	Unanswered	Yes	Unanswered	1
	Notes:						
3d - If your representation relates to a new, deleted or amende	•	he site as a Candidate S ast/West of St Athan Ro		(If "Yes", plea	J	ate Site Name and ref rence: 2446/CS1, 244	erence if known) 46/CS2, 2451/CS2 (part),
3e - Please set out your representation below:						.===========	
Proposed housing allocation MG2 (13) is subject to a det	ailed objection by way o	of a sepa <mark>rate</mark> representat	ion.				
As a consequence of the site's proposed deletion it will b Landscape Areas background paper (TACP, 2011) and a				a under proposed poli	cy MG21 (2), as re	commended in the De	esignating Special
The site is contiguous with the landform and scenic quali contained within Designation of Special Landscape Areas						ts inclusion is consiste	ent with the methodology
3f - Please outline the changes you wish to see made to the D Inclusion of aforementioned candidate sites with the prop		`	21 (2).				
4h - If you wish to speak please confirm which part of your re	presentation you wish to	n sneak to the inspector :	ahout and why the	v consider it he neces	sary to speak at th	e hearing -	

Representor ID and details: 4951/DP1 James L Grove							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform			be consiered by 'written sion of Public examinati	n representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	•	e Plan is unsound and d		et one or more test(s) of	soundness, plea	se indicate which test(s) that it fails.
	Procedural Tests -	P1 - No	P2 - No				
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	Yes	
	Coherence and Effect	veness Tests - CE1 - `	Yes 	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
	MD3	3.4					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(l	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy: N	lew Paragraph:	Amended Paragrap	h: New Or Ame	nded Site: Other (see I	Notes):
	No	Yes N	No	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t	he site as a Candidate S	Site? No	(If "Yes", pleas	se give the Cand	lidate Site Name and re	ference if known)
	Site Name:			F	Site Re	ference:	
3e - Please set out your representation below:				,			
First of all the selection sequence above is inadequate as procedure is not user-friendly.	my objection relates to	more than one paragra	ph but I was only	y allowed to choose one.	. There is one of	ojection but relating to the	nree paragraphs. This
The proposal for housing on the Cattle Market site shows years has just come to an end). During that time car park (leaseholder). It is likely that a right to use this land for ca Theatre and the Scouts HQ as provided in the leases. Ac	ing has been enjoyed or parking has accrued	on the adjacent market s through long use. This is	<mark>ite</mark> without specit s a legal rather tl	fic permission of the Val	le Council (the ov	wner) or the company, G	Blamorgan Marts
The proposed use also shows no regard for the wider nee have counted them on many occasions). Where will those Market site, the town has too little parking. It needs more	vehicles park in future						
3f - Please outline the changes you wish to see made to the D		,					
The Cattle Market site should have its existing informal sta	atus as a second town	car park established as	a permanent use). 			
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to	speak to the inspector	about and why th	hey consider it be neces	sary to speak at	the hearing -	

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

Representor ID and details: 4953/DP1 Matthew Wright							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform	, ,		be consiered by 'writter ion of Public examination	•
2a - Do you consider the LDP is Sound? Unsound	•	ne Plan is unsound and P1 - No	d does not not mee P2 - No	et one or more test(s) of s	soundness, pleas	e indicate which test(s)	that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 - `	Yes	
	Coherence and Effect	iveness Tests - CE1	- Yes	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(15)			MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph	h: New Or Amen	ded Site: Other (see N	
	No	Yes	No	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit to Site Name:	the site as a Candidate	Site? No	(If "Yes", pleas	se give the Candi	date Site Name and ref	erence if known)
3e - Please set out your representation below:				-			
I consider the Draft Deposit of the Local Development Pla	in to be unsound. The	inclusion of the reserv	ed site MG 2 (15).	I and to rear of Heol-v-Fo	elin Estate. I lant	wit Maior, is, Loonsider.	contrary to policy.
I believe the site to be contrary to the deliverability require development. Large amounts of the land will not be devel units on this site, increasing the build costs and diminishing the statement of the site	opable, thus reducing t	he amount of propertie	s that can be built				
Major infrastructure improvements would be required in o attractiveness of the scheme.	rder to provide suitable	access to the site wer	e it to be develope	ed. These would also req	uire much expend	diture from a developer	again reducing the
The plan must be considered feasible and deliverable in cunsound.	order for it to be sound.	I do not believe this re	serve site satisfies	s this requirement, and g	iven that it is incl	uded within the LDP, th	e LDP must therefore be
3f - Please outline the changes you wish to see made to the D Remove reserved site MG2 (15) from the Draft Deposit of		,	is ground as Glam	organ Heritage Coast, as	s per the outgoing	g Unitary Development	Plan.
4b - If you wish to speak, please confirm which part of your rel							

Representor ID and details: 4953/DP2 Matthew Wright							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examination	n representations' or do on? Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - No	d does not not me P2 - No	et one or more test(s) of	soundness, pleas	se indicate which test(s)) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - Yes	C4 -	Yes	
	Coherence and Effec	tiveness Tests - CE1	- Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(11)	<u>Paragrap</u>	h Number:	Proposal Map:	7	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your rep	presentation? Yes		(If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: No Notes:	Amended Policy: Yes	New Paragraph: No	Amended Paragrap No	oh: New Or Amei No	nded Site: Other (see No	Notes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site?	(If "Yes", plea	ase give the Cand Site Re	idate Site Name and ref ference:	ference if known)
3e - Please set out your representation below: The Welsh Assebley Government, in their document Loc compromising the ability of future generations to meet the		Wales, published 2005,	, defined sustaina	uble development as "dev	velopment which r	meets the needs of the	present without
The development of the argicultural market for residentia attractiveness of the town as a tourist destination.	l dwellings, in the mark	et town of Cowbridge, o	clearly affects the	ability of future generation	ons to meet their	own needs. It would hav	ve an impact on the
The development of the site would also have a dramatic workers in Cowbridge. The current parking arrangements that site, does not appear to be well drafted planning policy.	do not meet the need						
3f - Please outline the changes you wish to see made to the D Remove Agricultural Market Site, Cowbridge, designated			n for residential de	evelopment within the De	eposit Plan.		
4b - If you wish to speak, please confirm which part of your re	presentation you wish	to speak to the inspecto	or about and why	they consider it be neces	ssary to speak at	the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4954/DP1 Vaughan Gethin A	M, National Assembly	for Wales					
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0	Additional SA SEA		Rep format: Letter	,	ir comments to be cons a hearing session of P	•	•
·	Procedural Tests -	P1 - Unanswered	P2 - Unans	t one or more test(s) of so swered swered C3 - Unanswe			hat it fails.
		iveness Tests - CE1				CE4 - Unanswere	
, , ,	Policy Number: MG2(16)	<u>Paragraph</u>	Number:	Proposal Map:	<u>Cons</u>	traints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Unansw	vered (I	f "No" or "Unanswered" -	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragraph: Unanswered	New Or Amended Sit Unanswered	e: Other (see No Unanswered	otes):
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name:	the site as a Candidate	Site? Unanswe	red (If "Yes", please	give the Candidate Sit Site Reference:	e Name and refe	rence if known)
3e - Please set out your representation below:				y			

RE: Local Development Plan and Proposal MG2(16)

I have been contacted by several constituents who are concerned about the Vale of Glamorgan's recently published Local Development Plan consultation documents.

Many object to the proposed MG2(16) development at Fort Road and are concerned of the negative environmental impact that the situation of 450 new homes on Greenfield land will have on the relatively rural area. There are also understandable concerns over the capacity of local infrastructure to absorb such an increase in residential properties.

In addition several constituents have raised concerns relating to the LDP consultation process itself. These include disagreement in the figures presented in the summary Site Assessment and the detailed appraisal for the MG2(16) development as well as wider concerns over the accessibility of the consultation documents. These accessibility concerns include the highly technical nature of the LDP representation forms which are overly complex and will present a barrier to engagement for many affected by the Plan.

I would be grateful if you could confirm:

- 1. Why the building of 450 new homes at the location of MG2(16) was favoured over less rural areas and culturally-sensitive areas.
- 2. What consideration has been taken to the environmental impact that this development will have on the immediate area.
- 3. What consideration has been made of the capacity of local roads to accommodate construction traffic to and from the proposed site.
- 4. Outline the Vale of Glamorgan's plans to upgrade the local transport, water drainage and utilities network in view of the inevitable increase in demand that the development will generate.
- 5. Confirm what measures have been taken to reassess the merits of proposal MG2(16) in view of the discord between figures presented in the summary Site Assessment and the detailed appraisal.
- 6. Confirm what measures have been taken to promote accessibility of the consultation documents in accordance with Statement 8.3.2 of your Delivery Plan.
- 7. Outline the Vale of Glamorgan's plans to re-examine the appropriateness of the forms used for public consultation and re-run the defective and obstructive consultation process.

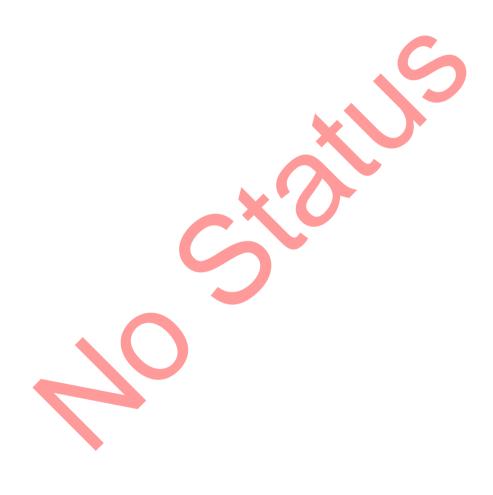
I look forward	to your repl	٧.
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(ordered by Representation ID No.)

Representor ID and details: 4954/DP1 Vaughan Gethin AM, National Assembly for Wales

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

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



Representor I	D and de	etails:	4954/DI	P2 Vaughan Gethin A	AM, N	National Assembly	for Wales									
Date Lodged 02/04/2012	Status M	Petitio	on and No. 0	Supporting Evidence	<u>Ac</u>	lditional SA SEA			Rep format: Letter					nsiered by 'wri Public examin		resentations' or do
2a - Do you co	nsider the	e LDP	s Sound?	Unanswered		If you think that th cedural Tests -	e Plan is unsound P1 - Unanswer		es not not me P2 - Unar		more test(s) o	of soundness,	please indi	cate which tes	t(s) tha	t it fails.
					Con	sistency Tests -	C1 - Unanswer	red	C2 - Unar	nswered	C3 - Unan	nswered	C4 - Unans	swered		
					Coh	erence and Effecti	veness Tests - (CE1 - Ur	nanswered	CE2 - L	Jnanswered	CE3 - Una	nswered	CE4 - Unans	swered	
3a - Which par	rt of the D	eposit	Plan are y	ou commenting on?	Poli	cy Number:	<u>Parag</u>	graph Nu	umber:	Propos	al Map:		Cor	nstraints Map	1	Appendices:
					MG	2(21). MG2(22)										
3b - Do you wi	sh to see	any ch	anges ma	de to the Deposit Plan	n as a	result of your repr	resentation? Una	answere	ed	(If "No" o	r "Unanswere	d" - go to 3d)		.=========		
3c - What chai	nges wou	ld like t	o see mad	le to the Deposit Plan?		ew Policy: nanswered	Amended Policy: Unanswered		w Paragraph: answered		ended Paragra nswered	aph: New Or Unansw		Site: Other (se Unanswe		<u>s):</u>
					No	ites:										
3d - If your re	presentat	ion rela	ates to a ne	ew, deleted or amende		e, did you submit t Name:	he site as a Candi	idate Site	e? Unansw	vered	(If "Yes", ple	-	Candidate Ste Referenc	Site Name and e:	referer	nce if known)
3e - Please se Re: LDP	,		sentation b	pelow:												
A numbe	r of reside	ents fro	m Llandou	igh have contacted me	e with	n concerns regardi	ng seriou <mark>s traffic</mark> , p	parking	and road safe	ety issues	in the area.					
Of partice the issue			the plans	for an additional 170 h	nome	s in the areas a res	sult of the Vale of	Glamorg	an Council's	Local Dev	velopment Pla	an's policies M	1G2 (21) an	d MG2 (22) wh	nich mig	tht further compound
I would b	e gratefu	l if you	considered	d meeting with local re	sider	nts and I to discuss	s these concerns.									
3f - Please ou	ıtline the o	change	s you wish	to see made to the D	epos	it Plan to make it s	sound (if relevant)									
4b - If you wis	sh to spea	ak, plea	se confirm	which part of your rep	orese	ntation you wish to	speak to the insp	ector ab	out and why	they cons	ider it be nece	essary to spea	ak at the he	aring -		

Representor ID and details: 4955/DP1 Renishaw PLC, c/	o Agent - Barton Willmo	ore LLP					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Comment form		•	consiered by 'written re of Public examination?	•
·	2b - If you think that the Procedural Tests -	e Plan is unsound and do P1 - Unanswered	oes not not meet P2 - Unans	` '	f soundness, please in	ndicate which test(s) th	at it fails.
	Consistency Tests -	C1 - Yes	C2 - Unans	wered C3 - Unans	swered C4 - Una	answered	
	Coherence and Effective	veness Tests - CE1 - L	Jnanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered	d
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph N	Number:	Proposal Map:	<u>9</u>	Constraints Map	Appendices:
				Key diagram- F	Page 29 .		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Yes	(If	"No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered		ew Paragraph: Inanswered	Amended Paragra Yes	ph: New Or Amende Unanswered	d Site: Other (see Not Unanswered	<u>es):</u>
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit th Site Name:	ne site as a Candidate Si	ite? No	(If "Yes", plea	ase give the Candidat Site Refere	e Site Name and reference:	ence if known)
3e - Please set out your representation below:				·			
We support the identification of the Miskin Site as a Strate Rhondda Cyon Taf. Whilst situated within the Vale of Glar important employment location for residents of Rhondda C	norgan, the Miskin site	immediately abuts the lo					
3f - Please outline the changes you wish to see made to the De	eposit Plan to make it s	ound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep Our clients land represents one of the three Strategic Opp investment and new job creation			•	•	, ,	· ·	or opportunity for inward

(ordered by Representation ID No.)

Representor ID and details: 4955/DP2 Renishaw PLC, c	o Agent - Barton Willn	nore LLP					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	, ,	our comments to be coat a hearing session of	•	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound and o P1 - Unanswered	does not not meet o	` '	soundness, please indi	icate which test(s)	that it fails.
	Consistency Tests -	C1 - Yes	C2 - Unansw	ered C3 - Unansv	wered C4 - Unans	swered	
	Coherence and Effect	tiveness Tests - CE1 -	Unanswered C	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	red
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number: F	Proposal Map:	Cor	nstraints Map	Appendices:
	SP10						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If "	No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragrap Yes	h: New Or Amended S Unanswered	Site: Other (see N Unanswered	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate S	Site? No	(If "Yes", pleas	se give the Candidate S Site Referenc		erence if known)

3e - Please set out your representation below:

The LDP Proposals Map (dated February 2012) identifies the Renishaw Site as being set within the Ely Valley Special Landscape Area (SLA). The majority of the Site is allocated for employment use.

Background research has been carried out in order to gain an understanding of the special landscape qualities which have been considered relevant by the Council in support of the Ely Valley Special Landscape Area designation at this stage in the LDP process.

Following on from this a landscape and visual appraisal of the Site and its surroundings has been carried out by Barton Willmore in order to establish the Site's contribution to these landscape and visual qualities and to confirm that the allocation of employment land at the Renishaw Site remains appropriate and achievable in accordance with the emerging LDP policies.

The Site is located south of the M4 motorway adjacent to Junction 34 of the M4 and the A4119. The Site is set within a substantially undulating landscape associated with the River Ely. Prominent ridgelines within the wider area are notable at Groes-Faen (approximately 82m AOD) to the north and at Kensal Grove (approximately 105m AOD) and Pendoylan (approximately 120m AOD) to the south west. The land drops to the Ely Valley and continues dropping gradually towards the south east. In the context of the wider landform the Site itself is set within the Ely Valley. The northern parts of the Site are undulating but are contained within the valley, with the highest points within the Site being at 36m AOD, which is low in comparison to the ridgelines evident in the wider context (at 82m and 120m AOD).

In addition to occasional woodland, copses and tree belts, the study area is characterised by a strong network of hedgerows, which contain the rural lanes and other roads meandering through the undulating landscape. The public right of way network which traverses the landscape is limited and, in many locations, rights of way are not marked and difficult to access, therefore limiting public access to the countryside. The M4 Motorway is well contained along the majority of its length through the study area.

Site Appraisal

The Site itself is undulating in the north and drops from high points of approximately 36m AOD to the lower areas associated with localised streams connecting to the River Ely at approximately 26m AOD.

The Site comprises of the following:

- The existing Bosch Site and associated access roads and parking:
- 3 Woodlands and 3 Areas with Tree Preservation Orders;
- The undulating, predominantly pastoral landscape to the north, compartmentalised into varied scale fields by established hedgerows and tree belts;
- Open flat grassland to the south east of the Bosch Site, adjacent to the railway line;
- The Scheduled Ancient Monument (Felin Isaf Motte and Bailey Castle) located between the Bosch Site and the railway line.

(ordered by Representation ID No.)

Representor ID and details: 4955/DP2 Renishaw PLC, c/o Agent - Barton Willmore LLP

Existing woodland either side of the access road is substantial and screens views into the Bosch Site when entering from Junction 34 of the M4. Roadside features such as crash barriers and street lighting are dominant features within the landscape on entering the Site from the west. The Bosch Complex comprises a series of large scale depot buildings with a visually prominent stack. Boundary treatments are predominantly 2m high chain link security fences.

Infrastructure associated with the Bosch complex is extensive and includes the access road, a large parking area and a network of roads and height restriction structures leading around the complex.

The Scheduled Ancient Monument is set within a grassed area adjacent to the railway line to the south west of the complex. Vegetation along the railway line includes occasional tree belts and hedgerows. Trains using the railway are visible when passing the Site.

Within the Bosch Complex, landscape features include the Scheduled Ancient Monument and its immediate landscape setting and the existing vegetation adjacent to the railway line.

The land to the south of the Bosch Complex comprises an area of flat wet grassland. The ecological appraisal for the Site identifies this open area as of moderate ecological constraint with habitat potential for foraging and basking reptiles and potentially great crested newts. In terms of landscape character sensitivity, features worthy of retention include the existing vegetation along the railway line and the established tree belts and individual mature trees to the north and east which provide a sense of enclosure to this open land.

The land rises up to a locally high point of approximately 36 m AOD within the northern parts of the Site. Well established hedgerows and tree belts compartmentalise the landscape into a series of enclosed fields with limited views out towards the wider landscape from the elevated fields.

Visual Appraisal

Views across the undulating landscape are limited. Where more extensive views are possible, these are contained by the ridgelines at Groes-Faen to the north and at Kensal Grove and Pendoylan to the south

The Site itself is visually well contained and difficult to perceive in the context of the wider. undulating Elv River Valley landscape. Limited near distance partial transient views are available from the M4 westbound and the railway to the south of the Site. Middle distance transient views of the built form on the Bosch Site are possible from limited receptors.

In the context of the wider undulating Elv River Valley Landscape, the Site does not contain any prominent landscape features and is not dramatic in terms of its topography and views. Prominent features visible in the wider landscape include the ridgelines at Groes-Faen to the north and at Kensal Grove and Pendovlan to the south west. The Site does not form a visual backdrop to settlements in the area and therefore has a low contribution to the overall setting of the Ely Valley and Ridge Slopes SLA.

Detractors in the landscape in the vicinity of the Site include the traffic movement and associated noise, lighting columns and signage associated with the M4 motorway, junction 34 of the M4 and the access roads, infrastructure and built form associated with the existing Bosch Complex. These features detract from any sense of remoteness and tranquillity within the Site. The existing Bosch Site has resulted in a loss of pre-industrial field patterns within the developed parts of the Site.

In conclusion the allocation of the Site for employment use is considered appropriate in the context of the adjacent Special Landscape Area, provided that such development fully considers and maintains the special qualities of the Ely Valley Special Landscape Area. A landscape impact assessment has been carried out and will inform development proposals. Careful consideration of siting, orientation, layout and landscaping will ensure that the special qualities of the SLA are protected and that the key policy and management issues for the SLA are adhered to.

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

Representor ID and details: 4955/DP3 Renishaw PLC, c.	o Agent - Barton Willmore LLP			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		your comments to be consiered by 'written re k at a hearing session of Public examination?	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and or Procedural Tests - P1 - Unanswered	does not not meet one or more test(s) o P2 - Unanswered	f soundness, please indicate which test(s) the	at it fails.
	Consistency Tests - C1 - Yes	C2 - Unanswered C3 - Unan	swered C4 - Unanswered	
	Coherence and Effectiveness Tests - CE1 -	Unanswered CE2 - Unanswered	CE3 - Unanswered CE4 - Unanswered	j
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph	Number: Proposal Map:	Constraints Map	Appendices:
		Section 7: Mar the Vale of Glamorga		Other - Not Listed
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan?		New Paragraph: Amended Paragra Unanswered Unanswered	ph: New Or Amended Site: Other (see Note Unanswered Unanswered	es):
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate s Site Name:	Site? No (If "Yes", ple	ase give the Candidate Site Name and refere Site Reference:	ence if known)
3e - Please set out your representation below: We object to this section of the LDP on the basis that the Athan Strategic Opportunity Area (Policy MG4). Our Clier a matter of consistency. It is considered that there is a demand for large scale oper client's land performs this function and this is evident from	nt's land is listed as a Strategic Employment Si rators within B1, B2 and B8 Uses, seeking ava	te within Policy SP5 and MG12, along with the within Policy SP5 and MG12, along with direct strategically located sites with direct strategical strate	with other Strategic Sites listed within Policy S	SP2. We consider it is
3f - Please outline the changes you wish to see made to the D				
Add a new Policy within the Managing Growth in the Vale allocated for the development of 77.29 Hectares of emplo		and to the South of Junction 34, M4, He	ensol', Land to the south of Junction 34 of the	e M4, Hensol is
4b - If you wish to speak, please confirm which part of your rep Our client's land represents one of the three Strategic Op inward investment and new job creation.				or opportunity for

(ordered by Representation ID No.)

Representor ID and details: 4955/DP4 Renishaw PLC	C, c/o Agent - Barton Willn	nore LLP					
Date Lodged Status Petition and No. Supporting Evide 02/04/2012 M 0	nce Additional SA SEA		Rep format: Comment form	,	your comments to be control to	,	
2a - Do you consider the LDP is Sound? Unsound	•	P1 - Unanswered	d does not not meet of P2 - Unansw	ered	of soundness, please inc		that it fails.
	Coherence and Effect	tiveness Tests - CE1	- Unanswered C	E2 - Unanswered	CE3 - Unanswered	CE4 - Unanswer	red
3a - Which part of the Deposit Plan are you commenting on	? Policy Number: MG21	Paragrap 		Proposal Map:	Cc	onstraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit F	Plan as a result of your rep	presentation? Yes	(If "	No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit P	lan? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Yes	nph: New Or Amended Unanswered	Site: Other (see Note Unanswered	
3d - If your representation relates to a new, deleted or ame	ended site, did you submit Site Name:	the site as a Candidate	e Site? No	(If "Yes", ple	ase give the Candidate Site Referen		erence if known)
20 Diagon ant out your representation below							

3e - Please set out your representation below:

Policy MG21 – Special Landscape Areas

The LDP Proposals Map (dated February 2012) identifies the Renishaw Site as being set within the Ely Valley Special Landscape Area (SLA). The majority of the Site is allocated for employment use.

Background research has been carried out in order to gain an understanding of the special landscape qualities which have been considered relevant by the Council in support of the Ely Valley Special Landscape Area designation at this stage in the LDP process.

Following on from this a landscape and visual appraisal of the Site and its surroundings has been carried out by Barton Willmore in order to establish the Site's contribution to these landscape and visual qualities and to confirm that the allocation of employment land at the Renishaw Site remains appropriate and achievable in accordance with the emerging LDP policies.

The Site is located south of the M4 motorway adjacent to Junction 34 of the M4 and the A4119. The Site is set within a substantially undulating landscape associated with the River Ely. Prominent ridgelines within the wider area are notable at Groes-Faen (approximately 82m AOD) to the north and at Kensal Grove (approximately 105m AOD) and Pendoylan (approximately 120m AOD) to the south west. The land drops to the Ely Valley and continues dropping gradually towards the south east. In the context of the wider landform the Site itself is set within the Ely Valley. The northern parts of the Site are undulating but are contained within the valley, with the highest points within the Site being at 36m AOD, which is low in comparison to the ridgelines evident in the wider context (at 82m and 120m AOD).

In addition to occasional woodland, copses and tree belts, the study area is characterised by a strong network of hedgerows, which contain the rural lanes and other roads meandering through the undulating landscape. The public right of way network which traverses the landscape is limited and, in many locations, rights of way are not marked and difficult to access, therefore limiting public access to the countryside. The M4 Motorway is well contained along the majority of its length through the study area.

The Vale of Glamorgan Borough Council's Designation of Special Landscape Areas Final Report dated March 2008, provides an overview of the SLA designations and provides policy and management guidelines and guidance to the Council in reviewing boundaries of SLA's during the Local Development Plan process. In this assessment the Ely Valley SLA is recommended to be extended to include Hensol Forest to the west (as a result of high evaluations in the visual and sensory, geological, habitat and cultural LANDMAP data) and to exclude the north east corner (as a result of insufficiently high 'aspect' topic evaluations to justify exclusions). The report was subsequently updated in February 2011 to provide a review of the Special Landscape Areas against historic landscapes evaluation.

Site Appraisal

The Site itself is undulating in the north and drops from high points of approximately 36m AOD to the lower areas associated with localised streams connecting to the River Ely at approximately 26m AOD.

(ordered by Representation ID No.)

Representor ID and details: 4955/DP4 Renishaw PLC, c/o Agent - Barton Willmore LLP

The Site comprises of the following:

- The existing Bosch Site and associated access roads and parking;
- 3 Woodlands and 3 Areas with Tree Preservation Orders;
- The undulating, predominantly pastoral landscape to the north, compartmentalised into varied scale fields by established hedgerows and tree belts;
- Open flat grassland to the south east of the Bosch Site, adjacent to the railway line;
- The Scheduled Ancient Monument (Felin Isaf Motte and Bailey Castle) located between the Bosch Site and the railway line.

Existing woodland either side of the access road is substantial and screens views into the Bosch Site when entering from Junction 34 of the M4. Roadside features such as crash barriers and street lighting are dominant features within the landscape on entering the Site from the west. The Bosch Complex comprises a series of large scale depot buildings with a visually prominent stack. Boundary treatments are predominantly 2m high chain link security fences.

Infrastructure associated with the Bosch complex is extensive and includes the access road, a large parking area and a network of roads and height restriction structures leading around the complex.

The Scheduled Ancient Monument is set within a grassed area adjacent to the railway line to the south west of the complex. Vegetation along the railway line includes occasional tree belts and hedgerows. Trains using the railway are visible when passing the Site.

Within the Bosch Complex, landscape features include the Scheduled Ancient Monument and its immediate landscape setting and the existing vegetation adjacent to the railway line.

The land to the south of the Bosch Complex comprises an area of flat wet grassland. The ecological appraisal for the Site identifies this open area as of moderate ecological constraint with habitat potential for foraging and basking reptiles and potentially great crested newts. In terms of landscape character sensitivity, features worthy of retention include the existing vegetation along the railway line and the established tree belts and individual mature trees to the north and east which provide a sense of enclosure to this open land.

The land rises up to a locally high point of approximately 36 m AOD within the northern parts of the Site. Well established hedgerows and tree belts compartmentalise the landscape into a series of enclosed fields with limited views out towards the wider landscape from the elevated fields.

Visual Appraisal

Views across the undulating landscape are limited. Where more extensive views are possible, these are contained by the ridgelines at Groes-Faen to the north and at Kensal Grove and Pendoylan to the south west. The Site itself is visually well contained and difficult to perceive in the context of the wider undulating Ely River Valley landscape. Limited near distance partial transient views are available from the M4 westbound and the railway to the south of the Site. Middle distance transient views of the built form on the Bosch Site are possible from limited receptors.

In the context of the wider undulating Ely River Valley Landscape, the Site does not contain any prominent landscape features and is not dramatic in terms of its topography and views. Prominent features visible in the wider landscape include the ridgelines at Groes-Faen to the north and at Kensal Grove and Pendoylan to the south west. The Site does not form a visual backdrop to settlements in the area and therefore has a low contribution to the overall setting of the Ely Valley and Ridge Slopes SLA.

Detractors in the landscape in the vicinity of the Site include the traffic movement and associated noise, lighting columns and signage associated with the M4 motorway, junction 34 of the M4 and the access roads, infrastructure and built form associated with the existing Bosch Complex. These features detract from any sense of remoteness and tranquillity within the Site. The existing Bosch Site has resulted in a loss of pre-industrial field patterns within the developed parts of the Site.

In conclusion the allocation of the Site for employment use is considered appropriate in the context of the adjacent Special Landscape Area, provided that such development fully considers and maintains the special qualities of the Ely Valley Special Landscape Area. A landscape impact assessment has been carried out and will inform development proposals. Careful consideration of siting, orientation, layout and landscaping will ensure that the special qualities of the SLA are protected and that the key policy and management issues for the SLA are adhered to.

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

Representor ID and details: 4955/DP5 Renishaw PLC, c/	o Agent - Barton Willmore LLP		
Date Lodged Status Petition and No. Supporting Evidence 04/02/2012 M 0	Additional SA SEA		ments to be consiered by 'written representations' or do rring session of Public examination? Examination
•	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	pes not not meet one or more test(s) of soundne P2 - Unanswered	ess, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Yes	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Unanswered CE3 - U	Unanswered CE4 - Unanswered
, , ,	Policy Number: Paragraph N SP5	Number: Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3	3d)
3c - What changes would like to see made to the Deposit Plan?			Or Amended Site: Other (see Notes): Unanswered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Sit Site Name:	te? No (If "Yes", please give t	the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: We support the allocation of land to the South of Junction Cardiff Strategic Opportunity Area (SOA), as identified at Opportunity Area, yet the Key Diagram nor the Proposals We also consider that paragraph 5.38 should refer to good	paragraph 2.9. We consider that land south of Ju Map (February 2012) clearly identify the extent of	unction 34 of the M4 at Miskin forms part of the	wider Llantrisant/North West Cardiff Strategic
3f - Please outline the changes you wish to see made to the Dicearer definition, illustration and cross referencing should consider that paragraph 5.38 should refer to good motorw	be made to Policy SP5 and throughout the LDP	² between the various Strategic Sites, in particu	llar the three Strategic Opportunity Areas. We also
4b - If you wish to speak, please confirm which part of your rep Our client's land represents one of the three Strategic Oppinward investment and new job creation.			•

Representor ID and details: 4955/DP6 Renishaw PLC, c/	o Agent - Barton Willmore LLP		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0		Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Examination)
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and doe Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Yes Coherence and Effectiveness Tests - CE1 - Un	es not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. P2 - Unanswered C2 - Unanswered C3 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered	· =
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Nu SP2	umber: Proposal Map: Constraints Map Appendices:	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: New Policy: Yes Yes Notes:	ew Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered	
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site Site Name:	e? No (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:	
Site. This policy is also unclear on how it defines a Strategic Si Diagram as a Strategic Regeneration Site (SRS); Policy S and the land adjacent to the airport and Port Road, Rhoos "Three strategic employment sites have been allocated w	te. All three named allocated sites within Policy SP2 identifies St. Athan as a Strategic Opportunity se, is a Strategic Employment Site. Furthermore phich seek to capitalise on the proposed Aerospace	age 29) and fails to identify land to the south of junction 34 M4 Hensol (the Miskin Site) as a Strategic SP2 are allocated and defined differently. The allocated site at Barry Waterfront is identified on the Key Area (SOA) although it is also identified as a Strategic Employment and Strategic Regeneration Site paragraph 7.49 of the LDP clearly states: ce Business Park at St. Athan, Cardiff Airport and the proximity of the M4 motorway."	e, Î
evidence base that could be used to inform the allocation On this basis and given that land south of the Junction 34 M4 Hensal should also be listed as a Strategic Site. Our	of sites within the emerging Local Development P M4 is both allocated as a Strategic Opportunity A client's land is listed as a Strategic Employment S demand for large scale operators within B1, B2 a	Plan. Area and Strategic Regeneration Site, as defined on the Key Diagram, land to the south of junction 34 Site within Policy SP5 and MG12 along other Strategic Sites listed within policy SP2, and we consider and B8 Uses, seeking available strategically located sites with direct motorway access within the VoG	4 r it
and function of a strategic site within the Vale of Glamorga associated jobs, capitalising on the direct motorway access encourage further scope for research and development pr	as a Strategic Site within Policy SP2 and the follow M4, and on the edge of four local Planning Authorian policy framework. Key elements of this proposes from the M4. New facilities at this site will offer organized and could act as a catalyst for future in	orities, the strategic employment allocation to the south of junction 34 M4 Hensal can perform the role osal include the provision of B1, B2 and B8 Uses with the potential for logistics based development and an an opportunity to develop relationships with local universities at Cardiff and Swansea, which will investment and attracting new business into the area."	
4b - if you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector abo	bout and why they consider it be necessary to speak at the hearing -	

Representor ID and details: 4955/DP7 Reni	shaw PLC, c/o Agent - Barton Willn	more LLP				
Date Lodged Status Petition and No. Support 02/04/2012 M 0	ing Evidence Additional SA SEA			•	iered by 'written representatio ublic examination? Examina	
2a - Do you consider the LDP is Sound? Unsound	d 2b - If you think that t Procedural Tests -	he Plan is unsound and does not P1 - Unanswered P2	not meet one or more test(s) Unanswered	of soundness, please indica	te which test(s) that it fails.	
	Consistency Tests -	C1 - Yes C2	Unanswered C3 - Una	nswered C4 - Unansw	ered	
	Coherence and Effec	tiveness Tests - CE1 - Unansw	ered CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered	
3a - Which part of the Deposit Plan are you comm	enting on? Policy Number:	Paragraph Number	Proposal Map:	Const	raints Map Appendice	<u>:S:</u>
				Delive	Page 118- Other - No ery and mentation	ot Listed
3b - Do you wish to see any changes made to the	Deposit Plan as a result of your rep	presentation? Yes	(If "No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the I	Deposit Plan? New Policy: Unanswered	Amended Policy: New Par Unanswered Unansw		aph: New Or Amended Site Unanswered	e: Other (see Notes): Unanswered	
	Notes:					
3d - If your representation relates to a new, delete	ed or amended site, did you submit Site Name:	the site as a Candidate Site?	lo (If "Yes", pl	ease give the Candidate Site Site Reference:	e Name and reference if know	/n)
3e - Please set out your representation below: We note the Delivery and Implementation tak requirements that indicate delivery of the site development and provision of infrastructure. investment. The scale of buildings on site is investment in refurbishment, it will be necess	from 2011. We recognise and sup To enable Renishaw Plc to succes excellent, however the high tech na	pport the need to submit an outlin ssfully move into the Miskin Site of ature and specification of Renish	e planning application for the xisting premises a major refu	whole site in order to ensure bishment programme is req	e a comprehensive approach tuired, and will be subject to si	to ignificant
3f - Please outline the changes you wish to see m	nade to the Deposit Plan to make it	sound (if relevant)				
4b - If you wish to speak, please confirm which pa	art of your representation you wish t	to speak to the inspector about a	nd why they consider it be ned	essary to speak at the hear	ing -	
Our clients land represents one of the three sinvestment and new job creation.	, ,		• •		•	y for inward

Representor ID and details: 4955/DP8 Renishaw PLC, c	o Agent - Barton Willmo	ore LLP				
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		Rep format: Comment form	1	our comments to be consiered but a hearing session of Public e	oy 'written representations' or do xamination? Examination
2a - Do you consider the LDP is Sound? Unsound	•	P1 - Unanswered C1 - Yes	P2 - Unans C2 - Unans	wered		ch test(s) that it fails.
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	n Number:	Proposal Map:	<u>Constraints</u>	Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Yes	(It	f "No" or "Unanswered"	- go to 3d)	
3c - What changes would like to see made to the Deposit Plan			New Paragraph: Unanswered	Amended Paragrap Yes	h: New Or Amended Site: Oth Unanswered Un	answered
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	e site as a Candidate	Site? No	(If "Yes", plea	se give the Candidate Site Nam Site Reference:	e and reference if known)
3e - Please set out your representation below:				y		
We are concerned that a CIL will be introduced under the client's land. Within Section 8 of the LDP, Infrastructure titled 'Infrastructure and Implementation Requirements', r From the LDP we are therefore not clear how a CIL contr. We generally support the principle of either providing or c scheme acceptable in planning terms, subject to any requand Circular 13/97: Planning Obligations, and as now inclidentified in the Plan from the outset. We wish to be included.	requirements are discuss no specific strategic infrastibution would reasonably otherwise contributing towairements being fairly and uded within the CIL Regulations.	sed. Pages 118-119 It structure items are list to be sought from this dwards the provision of dreasonably related in ulations. It is important	nighlight land to the ted. There are onlevelopment, wher securing new and in scale and linked that the policy a	e South of Junction 34, ly references to on site in the no strategic infrastruction improved community in to the development pro	M4, Hensol (Our client's interes matters relating to flood zones a ture improvements have been in frastructure, facilities and service posed so they meet the tests se	t). However within the column and foul and surface water flows. dentified by the Council. tes that are necessary to make a set out in Planning Policy Wales
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it so	ound (if relevant)				
The Policy and Section 8 of the LDP should be discussed CIL are clear from the outset.	I further, particularly with	those with interests in	n developing strate	egic sites, such as Miski	n, to ensure that the requiremen	nts of either planning obligations or
4b - If you wish to speak, please confirm which part of your rel Our clients land represents one of the three Strategic Oplinward investment and new job creation.			•	•		riding a major opportunity for

Representor ID and details: 4955/DP9 Renishaw PLC, c	o Agent - Barton Willmore LLP			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		ur comments to be consiered by 'written r t a hearing session of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of se P2 - Unanswered	oundness, please indicate which test(s) the	hat it fails.
	Consistency Tests - C1 - Yes	C2 - Unanswered C3 - Unansw	ered C4 - Unanswered	
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Unanswered	CE3 - Unanswered CE4 - Unanswere	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map	Appendices:
	MD6			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" -	go to 3d)	
3c - What changes would like to see made to the Deposit Plan'		ew Paragraph: Amended Paragraph Inanswered Yes	New Or Amended Site: Other (see No Unanswered Unanswered	<u>vtes):</u>
	Notes:			
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Si Site Name:	te? No (If "Yes", please	e give the Candidate Site Name and refer Site Reference:	rence if known)
3e - Please set out your representation below: We acknowledge the need for new development to positive located within a Flood Zone and is highly unlikely this area habitats within the site e.g. attenuation ponds, areas of	a of the site would be developed. This size of ou	ur client's site would allow for appropriate	mitigation and management through the	creation of new
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)			
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector a	about and why they consider it be necess	ary to speak at the hearing -	
Our clients land represents one of the three Strategic Oppinvestment and new job creation.	portunity Areas in the Vale of Glamorgan and the	: Miskin Site can deliver significant econo	mic benefits for the Vale providing a major	or opportunity for inward

Representor ID and details: 4955/DP10 Renishaw PLC, c	/o Agent - Barton Willmore LLP		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		nments to be consiered by 'written representations' or do earing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and de Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of soundr P2 - Unanswered	ness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Yes	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - L	Unanswered CE2 - Unanswered CE3 -	Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: <u>Proposal Map:</u>	Constraints Map Appendices:
	MD11		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to	o 3d)
3c - What changes would like to see made to the Deposit Plan			w Or Amended Site: Other (see Notes): answered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Si Site Name:	ite? No (If "Yes", please give	the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below:			
opportunities for research and development. The scale a overnight stays, conference stays, and international busin	t affect the integrity of these sites, may be perm e policy appears to restrict ancillary uses to 'sma umbers of people. The nature of Renishaw Plo' nd nature of these operations would lend themse less. Associated with that is a need for food, dri 1/D2 Uses (e.g. a public house, restaurants, crèc	itted. We object to this policy and consider that or limited components within a site. The St business is likely to attract overtime, investor elves to on site provision of ancillary developmink and commercial leisure. To complement erche, leisure club/gym). These Uses provided or	at it needs to be redrafted to enable Strategic Sites in trategic Site at Miskin has the potential to deliver a range is to the site, potentially other company headquarters and ent, for example a hotel. This could facilitate visitor imployment at the site, our client seeks the flexibility to on site will serve employees during the day, and either side
Given its location, land to the south of junction 34, M4 car the M4.	n incorporate ancillary uses for the surrounding a	area. The provision of suitable ancillary facilitie	s will be encouraged by the good access the site has to
3f - Please outline the changes you wish to see made to the D We consider that flexibility in line with the above, should be			
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector a	about and why they consider it be necessary to	speak at the hearing -

Representor ID and de	etails: 4955/D	P11 Renishaw PLC, c	o Agent - Barton Willn	nore LLP					
Date Lodged Status 02/04/2012 M	Petition and No.	Supporting Evidence	Additional SA SEA		Rep format: Comment for	.	your comments to be colk at a hearing session o	,	•
2a - Do you consider the	e LDP is Sound?	Unsound	Procedural Tests -	P1 - Unanswe	ered P2 - Unan	swered	of soundness, please ind	,	s) that it fails.
			Consistency Tests - Coherence and Effect		C2 - Unan CE1 - Unanswered	CE2 - Unanswered	nswered C4 - Unan CE3 - Unanswered	CE4 - Unansw	ered
3a - Which part of the D	Deposit Plan are y	G	Policy Number: MG3. MG4	<u>Para</u>	agraph Number:	Proposal Map:	<u>Co</u>	nstraints Map	Appendices:
3b - Do you wish to see	any changes ma	de to the Deposit Plan	as a result of your rep	oresentation? U	nanswered (If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would	ld like to see mad	e to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Polic Unanswered	y: New Paragraph: Unanswered	Amended Paragra Yes	Aph: New Or Amended Unanswered	Site: Other (see Unanswere	
3d - If your representati	ion relates to a ne	ew, deleted or amende	d site, did you submit Site Name:	the site as a Cand	didate Site? No	(If "Yes", ple	ease give the Candidate Site Referenc		eference if known)
3e - Please set out you	ır representation b	pelow:				,			
3f - Please outline the o	changes you wish	to see made to the D	eposit Plan to make it	sound (if relevant)					
4b - If you wish to spea	ak, please confirm	which part of your rep	resentation you wish t	to speak to the ins	spector about and why t	they consider it be nece	essary to speak at the he	 earing -	

Representor ID and details: 4955/DP12 Renishaw PLC, c/	o Agent - Barton Willmore LLP		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		do you want your comments to be consiered by 'written representations' or do want to speak at a hearing session of Public examination? Examination
,	2b - If you think that the Plan is unsound ar Procedural Tests - P1 - Unanswered		more test(s) of soundness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Yes	C2 - Unanswered	C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE	1 - Unanswered CE2 - U	Inanswered CE3 - Unanswered CE4 - Unanswered
	Policy Number: Paragra MG12	nph Number: Proposa	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or	""Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: Unanswered Unanswered Notes:	New Paragraph: Ame Unanswered Yes	unded Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candida Site Name:	te Site? No	(If "Yes", please give the Candidate Site Name and reference if known) Site Reference:
Employment Site at Miskin has the potential to deliver a ra investors to the site, potentially other company headquarted development, for example a hotel. This could facilitate vis complement employment at the site, our Client seeks the	ange of B1, B2 and B8 developments, and ears and opportunities for research and develitor overnight stays, conference stays, and flexibility to delivery an element of floorspace, and either side of their usual hours of employees.	mploy significant numbers of lopment. The scale and natu international business. Asso se for A3, A4 and some D1/D ployment, in addition to busin	he importance of also being able to provide ancillary uses on site. The Strategic f people. The nature of Renishaw Plc's business is likely to attract overtime, ure of these operations would lend themselves to on site provision of ancillary sciated with that is a need for food, drink and commercial leisure. To 2 Uses (e.g. a public house, restaurants, crèche, leisure club/gym). These less visitors on the site. On site provision will also reduce the need for non
3f - Please outline the changes you wish to see made to the Down We consider that flexibility in line with the above, should be			
4b - If you wish to speak, please confirm which part of your rep Our clients land represents one of the three Strategic Opp investment and new job creation.			ider it be necessary to speak at the hearing - significant economic benefits for the Vale providing a major opportunity for inward

Representor ID and details: 4955/DP13 Renishaw PLC, c/	o Agent - Barton Willmore LLP
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Examination
,	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Yes C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: 4.13
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	P New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Yes Unanswered Unanswered
	Notes:
3d - If your representation relates to a new, deleted or amende	old site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
continued allocation of the Miskin Site in the LDP will facil people from the Vale of Glamorgan. This will reduce the r	nt of a diverse and sustainable local economy that needs the needs of the VoG and that of the wider South East Wales Region (Objective 8). The itate a major opportunity for inward investment and job creation in the VoG. The provision of employment land on the Site will increase opportunities for need for people to commute outside of the Vale for work.
	sociated jobs, capitalising on the direct motorway access from the M4.
3f - Please outline the changes you wish to see made to the D	eposit Plan to make <mark>it sound (if r</mark> elevant)
Our Client's land represents one of the three Strategic Op	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - portunity Areas in the Vale of Glamorgan and the Miskin Site can deliver significant economic benefits for the Vale providing a major opportunity for at the objective should reference how it will meet the need to foster development of a diverse and sustainable local economy. We consider it could be through Strategic Sites, such as Miskin.

Representor ID and details: 4955/DP14 Renishaw	PLC, c/o Agent - Barton Willi	more LLP					
Date LodgedStatusPetition and No.Supporting Events02/04/2012M0	ridence Additional SA SEA		Rep format: Comment form	, ,	your comments to be co	,	n representations' or do ion? Examination
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	the Plan is unsound and o	P2 - Unanswe	ered		icate which test(s	s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Unanswe	ered C3 - Unans	swered C4 - Unan	swered	
	Coherence and Effect	tiveness Tests - CE1 -	Unanswered C	E2 - Unanswered	CE3 - Unanswered	CE4 - Unansw	ered
3a - Which part of the Deposit Plan are you commenting	on? Policy Number:	Paragraph	Number: P	Proposal Map:	Co	nstraints Map	Appendices:
		5.48					
3b - Do you wish to see any changes made to the Depos	sit Plan as a result of your re	presentation? Yes	(If "	No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Depos	it Plan? New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragrap Yes	ph: New Or Amended Supplemental Unanswered	Site: Other (see Unanswere	
	Notes:						
3d - If your representation relates to a new, deleted or a	mended site, did you submit Site Name:	the site as a Candidate S	Site? No	(If "Yes", plea	ase give the Candidate Site Reference		eference if known)
3e - Please set out your representation below:							
3f - Please outline the changes you wish to see made to	o the Deposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of y	our representation you wish	to speak to the inspector	about and why the	y consider it be nece	ssary to speak at the he	earing -	

Representor ID and details: 4955/DP15 Renishaw PLC, c	o Agent - Barton Willmore LLP			
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		nt your comments to be consiered by 'writte eak at a hearing session of Public examinat	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	nes not not meet one or more test(s P2 - Unanswered) of soundness, please indicate which test(s	s) that it fails.
	Consistency Tests - C1 - Yes	C2 - Unanswered C3 - Un	answered C4 - Unanswered	
	Coherence and Effectiveness Tests - CE1 - L	Inanswered CE2 - Unanswered	CE3 - Unanswered CE4 - Unansw	rered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	lumber: Proposal Map:	Constraints Map	Appendices:
	6.48			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswe	red" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan		ew Paragraph: Amended Paragranswered Yes	<u>Araph: New Or Amended Site: Other (see</u> Unanswered Unanswere	
	Notes:			
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Si Site Name:	te? No (If "Yes", p	olease give the Candidate Site Name and re Site Reference:	eference if known)
3e - Please set out your representation below:				
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)			
4b - If you wish to speak, please confirm which part of your rer	presentation you wish to speak to the inspector a	bout and why they consider it be ne	ecessary to speak at the hearing -	

Representor ID and details: 4955/DP16 Renishaw PLC, c	o Agent - Barton Willmore LLP		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		mments to be consiered by 'written representations' or do earing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and de Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of sound P2 - Unanswered	ness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Yes	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - L	Jnanswered CE2 - Unanswered CE3	- Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
	2.9		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go to	o 3d)
3c - What changes would like to see made to the Deposit Plan			ew Or Amended Site: Other (see Notes): nanswered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Si Site Name:	te? No (If "Yes", please give	e the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below:			
We acknowledge the identification of Llantrisant and Nort 51.1 hectares of land allocated for business uses includin funding being extended to these areas. We consider that the LPA should use this designation and Framework to present the control of the control	g B1, B2 and B8 and adjoins the former Bosch fidentifying areas as 'Strategic opportunities' sho	actory which occupies 11.70 hectares. The a ould be consistent with a Policy framework cap	llocation of SOA's provides the opportunity for European
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)	,	
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector a	about and why they consider it be necessary to	o speak at the hearing -
Our Client's land represents one of the three Strategic Opinward investment and new job creation. The site is immediately	, ,	3	1 0 , 11 ,

Representor ID and details: 4955/DP17 Renishaw PLC, c/	o Agent - Barton Willmo	re LLP					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	· · · · · · · · · · · · · · · · · · ·	our comments to be coat a hearing session of		
2a - Do you consider the LDP is Sound? Unsound 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that Procedural Tests - P1 - Unanswered P2 - Unanswered							hat it fails.
	Consistency Tests -	C1 - Yes	C2 - Unans	wered C3 - Unans	wered C4 - Unar	nswered	
	Coherence and Effective	eness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswere	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	n Number:	Proposal Map:	Co	onstraints Map	Appendices:
		3.20					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Yes	(If	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Yes	h: New Or Amended Unanswered	Site: Other (see No Unanswered	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit th Site Name:	e site as a Candidate	Site? No	(If "Yes", pleas	se give the Candidate Site Referen		rence if known)
3e - Please set out your representation below:							
We note there are number of challeges and opportunities these challenges identified at paragraph 3.20 is the high less potentially address this issue as the Site is located immed 'Rhonda Cyon Taf'. Given its location the Miskin Site serve	evels of out commuting to liately south of the M4 (for work resulting in plunction 34) and whils	eak time congestion of situated within th	n on the main distributo e Vale of Glamorgan, it	or roads in the eastern immediately abuts the	Vale of Glamorgan. e local authority adm	The Miskin site can instrative area of
3f - Please outline the changes you wish to see made to the De	eposit Plan to make it so	ound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep Our client's land represents one of the three Strategic Opp investment and new job creation, and reverse out commute	portunity Areas in the Va			•		-	or opportunity for inward

Representor ID and details: 4955/DP18 Renishaw PLC, c/o Agent - Barton Willmore LLP	
Date Lodged Status Petition and No. Supporting Evidence Additional SA SEA 02/04/2012 M 0	Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Examination
•	
3a - Which part of the Deposit Plan are you commenting on? Policy Number:	Paragraph Number: Proposal Map: Constraints Map Appendices: 3.21
3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation	? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan? New Policy: Unanswered Unanswered Unanswered	
Notes:	
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Site Name:	a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: We acknowledge and support the LDP Policy Framework as set out in paragraph 3.21. In paragraph 3.21.	articular we make reference to the following:
the light of the Bosch factory closure, we consider this is even more pertinent. By locating r	ential to deliver manufacturing and research and development job opportunities to the VoG within the short term. In new facilities at Miskin, Renishaw Plc offer an opportunity to develop relationships with local universities at Cardiff and id could act as a catalyst for future investment and attracting new business into the area as well as meeting the local
The fifth bullet point aims to reduce out commuting. Being located immediately adjacent to j site within the VoG policy framework.	junction 34 of the M4, and on the edge of four LPAs, the Site performs the role and function of a strategic employment
	G. The proximity of the M4 (Junction 34) providing direct access to the Miskin Site is a significant factor and influence ort modes are supported and encouraged, the accessibility offered by junction 34 cannot and should not be key consideration for future investors to the Site.
3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if rel	levant)
4b - If you wish to speak, please confirm which part of your representation you wish to speak to to Our Client's land represents one of the three Strategic Opportunity Areas in the Vale of Glar inward investment and new job creation.	

Representor ID and details: 4956/DP1 Brynawel Fuchsia	& Garden Centre						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	you want to speak a	at a hearing sessio	e consiered by 'written ron of Public examination	? Speak at hearing
·	2b - If you think that th Procedural Tests - Consistency Tests -	P1 - No	P2 - No	t one or more test(s) of s	soundness, please	indicate which test(s) th	
3a - Which part of the Deposit Plan are you commenting on?	Coherence and Effecti Policy Number: MG2(2)	Paragrap		CE2 - No Proposal Map:	CE3 - No	CE4 - No Constraints Map Scheduled Ancient Monuments	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	<u>(I</u> 1	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: No Notes:	Amended Policy: Yes	New Paragraph: No	Amended Paragraph No	h: New Or Amend No	led Site: Other (see No No	<u>tes):</u>
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name:	he site as a Candidate	Site? No	(If "Yes", pleas	se give the Candida Site Refer	ate Site Name and refer rence:	ence if known)
3e - Please set out your representation below: Housing MG2 5.36 The development at the St Josephs site will have an 5.37 This development will erode the settlement boundaries MG 214.113 This development will detract from the special	es which the plan state	s will be maintained.		he quality of an area of s	special scientific in	terest, Cosmeston Cour	ntry Park, it will block
an important wildlife corridor and is yet another inrode on this important wildlife Ther is no rational arguement for this site to be developed It has no access to public transport, no pedestrian access unsuitability of the country lane.	on a country lane gree	en field site.		ave been consistntly turn	ned down for intrus	ion into the countryside	, access, and
3f - Please outline the changes you wish to see made to the De Therfore it should be removed from the plan as inappropris	· ·	` ,					
4b - If you wish to speak, please confirm which part of your rep This development will directly affect the viability of of Bryn: listen.	•		•	•		-	ee has bothered to

Representor ID and details: 4956/DP2 Brynawel Fuchsia	a & Garden Centre									
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0			Rep format: Eform	you want to spea	nk at a hearing sess	,	n representations' or do on? Speak at hearing			
2a - Do you consider the LDP is Sound? Unsound		2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.								
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 -	No				
	Coherence and Effec	tiveness Tests - CE1	- Yes	CE2 - No	CE3 - No	CE4 - No				
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u> 	h Number:	Proposal Map: MG10(1)	1	Constraints Map	Appendices:			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If "No" or "Unanswere	d" - go to 3d)					
3c - What changes would like to see made to the Deposit Plan	? New Policy: No	Amended Policy: Yes	New Paragraph: No	Amended Paragra		nded Site: Other (see I				
	Notes:									
3d - If your representation relates to a new, deleted or amend	ed site, did you submit Site Name:	the site as a Candidate	Site?	(If "Yes", ple	•	idate Site Name and re ference:	ference if known)			
3e - Please set out your representation below:										
MG10 (1) Penarth Learning Community										
Sully Road Access to these new and relocated schools.										
The current access to this development should be maintaged Garth, Ashgrove, St Josephs) and commuter traffic avoice				opriate on a country la	ne already strugglin	ng to cope with three oth	ner schools (Ysgol pen y			
No traffic flow surveys have been carried out. The LDP Plan contains no plans for upgrades to the road No upgrades to road junctions have been proposed. No funds are available or being allocated to upgrade the No funds are available or being allocated to upgrade/cha	Merrie Harrier/ Llandou		be essential to cop	pe with current traffic le	evels.					
3f - Please outline the changes you wish to see made to the D It should be removed from the plan as inappropriate and	unneccessary when an	exsisting entrance co								
4b - If you wish to speak, please confirm which part of your re				they consider it be nec	essary to speak at	the hearing -				
This new entrance and relocation of three schools will ha				en Centre and other bu	ısinesses already s	uffering from traffic con	gestion directly caused by			

Representor ID and details: 4957/DP1 Janie Jones										
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform				representations' or do on? Do not speak at he			
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - No P2 - No								
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 - N))				
		iveness Tests - CE1	- No	CE2 - Yes	CE3 - No	CE4 - No				
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:		h Number:	Proposal Map:		Constraints Map	Appendices:			
	SP1						• • • •			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If "No" or "Unanswered	' - go to 3d)					
3c - What changes would like to see made to the Deposit Plan	No No	Amended Policy: Yes	New Paragraph: No	Amended Paragrap No		ed Site: Other (see N				
	Notes:									
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site?	(If "Yes", plea	se give the Candida Site Refer	ate Site Name and refeence:	erence if known)			
3e - Please set out your representation below:										
Mae safle St Cyres Dinas Powys allan yn y wlad fe'i gelwi cheir ar bob ochr . Mae e'n filltir o'r tren a'r bysiau i Gaerd Mae pawb yn defnyddio ceir. Mae 340 0 dai yn golygu tu	ydd a'r Barri.Mae'r cyff	yrdd sy'n <mark>ar</mark> wain at r A4	055 wedi eu gorle	enwi a thagu da thraffic	yn aml yn ystod y d	ydd. Does neb yn cer	ain at y safle yn gul a dded i fyny'r allt serth.			
English Translation										
The St Cyres site in Dinas Powys is out in the country, an narrow and there are cars on both sides. It's a mile away steep hill. Everyone uses a car. 340 houses means approximately approximately and the steep hill.	from the trains and but oximately 500 extra ca	ses to Cardiff and Barr	y. The junction le	ading to the A4055 is of certainly won't benefit th	ten jam packed with	traffic during the day	. No-one walks up the			
3f - Please outline the changes you wish to see made to the D Dwn i ddim sut mae'n bosibl orchfygu'r problemau.										
Efallai y byddai nifer llai o dai yn gynaliadwy ond yn sicr d	dim mwy na 100.									
Hoffwm weld yr adeilad presennol -sef yr ysgol a'r caeau o	chwarae <mark>yn ca</mark> el eu ca	dw er budd y Gymuned								
English Translation										
I don't know how we can resolve the problems. A smaller fields, kept for the benefit of the community.	number of houses wo	uld possibly be sustaina	able but definitely	no more than 100. I wo	uld like to see the p	resent building, that is	s the school and playing			
4b - If you wish to speak, please confirm which part of your rep	presentation you wish t	o speak to the inspecto	r about and why t	hey consider it be neces	ssary to speak at the	e hearing -				

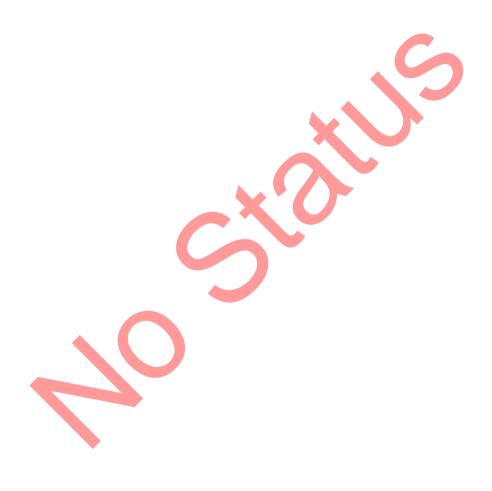
Representor ID and details: 4957/DP2 Janie Jones								
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform		at a hearing session	n of Public examinatio	representations' or do n?	
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - No P2 - No							
	Consistency Tests - C1 Coherence and Effectivene	ess Tests - CE1 - No	0		C4 - No			
3a - Which part of the Deposit Plan are you commenting on?		Paragraph Nu	umber:	Proposal Map:		Constraints Map	Appendices:	
3b - Do you wish to see any changes made to the Deposit Plan		ntation?	(If	"No" or "Unanswered"	- go to 3d)			
3c - What changes would like to see made to the Deposit Plan?		nended Policy: Ne	w Paragraph:		n: New Or Amende No	ed Site: Other (see N	<u>otes):</u>	
	Notes:							
3d - If your representation relates to a new, deleted or amende	Site Name:		e?	(If "Yes", please	e give the Candida Site Refer	ate Site Name and refe ence:	erence if known)	
Dydy'r polisi yma ddim yn gynaliadwy. Does dim gwelliann miloedd yn ychwanegol gan ychwanegu at y llygredd a'r lly 1. Cael Sewta i wneud astudiaeth fanwl o'r A4055 yn fuar 2. I Gyngor y Fro brynu tir i wneud lon beiciau o Ddinas Po 3. I Gyngor y Fro brynu tir wrth ochr y A 4055 i wneud pafi 4. Gorfodi Loriau trymion i fynd ar hyd y 4050. English Translation This policy is not sustainable. No improvements are being Dinas Powys, there will be thousands more adding to the 1. Insist that Sewta make a detailed study of the A4055 as 2. Insist that the Vale Council buy land for the provision of 3. Insist that the Vale Council buy land alongside the A 40 4. Force heavy lorries use the 4050. 3f - Please outline the changes you wish to see made to the Domae'r Cyngor wedi diddymu'r Ffordd Osgoi o Barri i Gaerd Teimlaf ei fod yn gam gwag yng nwyneb y ffaith bod Llywo Mae ffyrdd da yn hanfod i Ardal felly a'r ffordd cyflymaf rh English Translation The Council has scrapped the bypass from Barry to Cardin	ygredd swn sy'n poeni'r trigo n i weld yn lle mae'n nhw'n n bwys i'r Barri n saff yn enwedig o gofio bo n proposed for the A4055, ye pollution and sound pollution s soon as possible, to see w a cycle lane from Dinas Po 155 for the provision of a saf eposit Plan to make it sound lydd(Ffordd Osgoi Dinas Po odraeth Cymru yn edrych yn wng Caerdydd a'r Barri yw t	et thousands more ho meddwl y gellid rhoi lo o dau berson wed'u lla et thousands more ho in which is so troubles where a bus lane migh bwys to Barry. fe pavement, especial d (if relevant) bwys.)	dd Caerdydd. on bysiau heb d add ar y darn yr uses are to be l ome to Cardiff t be provided w lly as two peopl	dymchwel llawer o dai. na o'r ffordd llynedd. puilt, which means that a Road residents. ithout demolishing many e were killed on this stre	as well as the thous	sands of people who c		

Representation ID No.)

Representor ID and details: 4957/DP2 Janie Jones

I feel that this is a grave mistake as the Welsh Government are already looking closely at the possibility of creating a Civic Centre Area. Good roads will be essential to the area, and the quickest route from Cardiff to Barry is through Dinas Powys

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



Representor ID and details: 4957/DP3 Janie Jones									
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA	<u>Rep forma</u> Eform		•	be consiered by 'writter sion of Public examination	•			
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - No P2 - No								
	Consistency Tests - C1	- No C2 - No	C3 - No	C4 -	No				
	Coherence and Effectivenes	ss Tests - CE1 - No	CE2 - No	CE3 - No	CE4 - No				
, , ,	Policy Number: SP11	<u>Paragraph Number:</u> 	Proposal Map:	7	Constraints Map	Appendices:			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your represen	tation?	(If "No" or "Unanswered	d" - go to 3d)					
3c - What changes would like to see made to the Deposit Plan?	New Policy: Am	ended Policy: New Paragra	oh: Amended Paragra	ph: New Or Ame	ended Site: Other (see N	ed Site: Other (see Notes):			
	No No	No	No	No	No				
	Notes:								
3d - If your representation relates to a new, deleted or amende	d site, did you submit the sit Site Name:	re as a Candidate Site?	(If "Yes", plea		didate Site Name and reference:	ference if known)			
 3e - Please set out your representation below: TOURISTIAETH A HAMDDEN. Does dim son am geffylau yn yr LDP. er bod e'n ddiwydia ond ni welais i mo'u crybwyll yn y ddogfen. Mae'r bwriad i ceffylau y tu cefn i gaeau St Cyres. Mae'n bwysig cael ma Does dim digon o le ym mharc Cosmeston i'r ceffylau i gy 	adeiladu ar ben Murch Crese nnu gwyrdd i bobl i farchoga	cent yn mynd i ddifetha'r caeau	a adwaenir y ffordd hyn fel	l y caeau pony.yn	nogaeth. Mae angen ffyrc nghyd a'r caeau eraill lle r	dd i geffylau 'Bridle Ways' mae'r plant yn neidio			
English Translation									
TOURISM AND LEISURE. There is no mention of horses in the LDP, although they a mentioned in the document. The plan to build at the top o show jumping.	re a thriving industry around f Murch Crescent will destro	Dinas Powys. Lots of people or the fields known locally as the	ome from Cardiff to ride at pony fields, and also the o	t the weekend. B	ridle ways are required, ld St Cyres fields, where	but these are not the children practise			
It's important to have places for people to ride, considering There's not enough room in Cosmeston park for all the ho		nts on these roads.							
3f - Please outline the changes you wish to see made to the De Creu llwybrau saff i geffylau a'u perchnogion o gwmpas C	•	l (if relevant)							
English Translation									
Create safe routes for horses and their owners around St	Cyres fields.								
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to spea	ak to the inspector about and w	ny they consider it be nece	essary to speak at	t the hearing -				

Representor ID and details: 4957/DP4 Janie Jones										
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform		at a hearing sess	be consiered by 'written sion of Public examinatio				
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Procedural Tests -	o - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. rocedural Tests - P1 - No P2 - No								
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No				
		tiveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No				
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrapl</u>	n Number:	Proposal Map:		Constraints Map	Appendices:			
	MG2(22)									
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation?	(1	If "No" or "Unanswered"	- go to 3d)					
3c - What changes would like to see made to the Deposit Plan'		Amended Policy:	New Paragraph:	Amended Paragrap		nded Site: Other (see N				
	No	No	No	No	No	No				
	Notes:									
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site?	(If "Yes", pleas	se give the Candi Site Ref	idate Site Name and refe ference:	erence if known)			
3e - Please set out your representation below: GREEN WEDGE Mae'r polisi ei hun yn ganmoladwy er mwyn cadw cymeriad y gwahanol trefi a phentrefi.Fodd bynnag mae'r llain o dir sy rhwng Dinas Powys a Phenarth yn llawer rhy denau o fferm Glascoed lawr i Ffordd Cross Common. Dydy e ddim yn llain o dir gwyrdd mewn gwirionedd achos yr adeiladau sy arno o Laburnam Cottage i fyny i 'r Manor House Hotel. Mae pwysau cynyddol i adeiladu ar y darn yma o dir .Os caniateuir y tai gyferbyn a tai Glascoed yna fydd yna ddim llain o dir gwyrdd rhwng Dinas Powys a Phenarth. I'r De o Ddinas Powys mae'r llain gwyrdd wedi ei ddileu yn gyfangwbl PAM? Fe fydd dragwyddol heol i ddatblygwyr wneud fel y mynnwn nhw. English Translation GREEN WEDGE The policy itself is laudable as far as retaining the character of the various towns and villages is concerned. However, the wedge of land between Dinas Powys and Penarth is far too narrow from Glascoed farm down to Cross Common Road. It's not really green land as there are buildings on it from Laburnam Cottage up to the Manor House Hotel. There is increasing pressure to build on this piece of land. If the houses opposite Glascoed houses are allowed, there will be no green wedge between Dinas Powys and Penarth. To the south of Dinas Powys, the green wedge has been completely obliterated, WHY? Developers will at liberty to do exactly as they wish										
3f - Please outline the changes you wish to see made to the D Mae angen ail greu'r llain gwyrdd fel yr oedd yn yr UDP.	eposit Plan to make it	sound (if relevant)								
English Translation										
The green wedge should be restored to how it was in the	UDP.									
4b - If you wish to speak, please confirm which part of your rep	presentation you wish t	o speak to the inspecto	r about and why t	hey consider it be neces	sary to speak at	the hearing -				

Representor ID and details: 4957/DP5 Janie Jones
Date LodgedStatusPetition and No.Supporting EvidenceAdditional SA SEARep format:4a - do you want your comments to be consiered by 'written representations' or do02/04/2012M0Common service of the properties of the properti
2a - Do you consider the LDP is Sound? Sound 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CB3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on? Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MD6
3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan? New Policy: Unanswered Unansw
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below: Biodiversity
Mae Caeau a'r coedwigoedd o gwmpas Ysgol St Cyres yn lle cyfoethog iawn mewn adar yn enwedig tylluanod ac yslumod a mae cannoedd o frain yn heidio yno sawl gwaith y flwyddyn i gysgu - mae e'n olygfa trawiadol pan fyddant yn chwyrlio o gwmpas cyn clwydo. Mae'r Perthi o gwmpas y lle yn llawn o blanhigion amrywiol hefyd.
English Translation
The fields and woods surrounding St Cyres School are rich in birdlife especially owls and bats(sic erat scriptum) and crows flock in their hundreds to roost there several times a year. These are quite spectacular as they wheel around before coming home to roost. The surrounding hedgerows also abound in a variety of plant life.
3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) 1 Fe fydd hi'n gywilydd os na fyddai'r adran cynllunio yn rhwystro adeiladwyr rhag tynnu hen berthu allan er mwyn gwasgu mwy a mwy o dai i ardal llawn o amrywiaeth naturiol.
2. Mae angen parchu'r T.P.O's syn bod yn yr ardal hefyd.
3.Mae na hen lon fach -Y Lon Lyb a'i gelwir yn Lleol-Watery Lane. yn cysylltu Murch Crescent a Ffordd Sully Mae hi'n hen iawn buaswn ni yn tybied ei bod hi'n mynd nol i'r amser pan oedd pentrefi yn Nghosmeston . Dyma'r ffordd roedd yr hen bobl yn cerdded i gael cysgod rhag y tywydd garw. Mae hon yn werth ei chadw .
English Translation
1 It would be shameful if the planning section were to fail to prevent builders from pulling up ancient hedgerows in order to pack more and more housing into an area brimming with natural diversity. 2. T.P.Os in the area should also be respected. 3. There's an old lane, known locally as 'Y Lôn Lyb' (Watery Lane) which connects Murch Crescent and Sully Road. It's very old indeed and probably dates back to a time when there were villages at Cosmeston. This is the road the old folk used so that they would be sheltered from bad weather. It's worth conserving.
4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

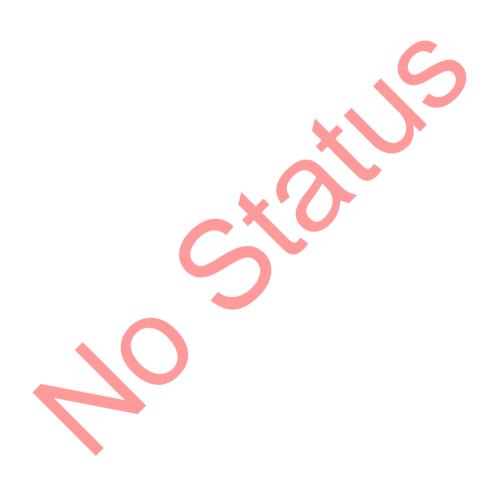
Representor ID and details: 4957/DP6 Janie Jones				<u> </u>
Date Lodged 02/04/2012Status MPetition and No. 0Supporting Evidence00	Additional SA SEA	<u>Rep format:</u> Eform	4a - do you want your comments to you want to speak at a hearing ses	be consiered by 'written representations' or do ssion of Public examination?
2a - Do you consider the LDP is Sound? Sound	•	nanswered P2 - Unanswered C2 - Unanswered		Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:		Proposal Map:	Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation	n? Unanswered (If	"No" or "Unanswered" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amende Unanswered Unansw	ed Policy: New Paragraph: ered Unanswered	Amended Paragraph: New Or Ame Unanswered Unanswered	
	Notes:			
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as Site Name:	a Candidate Site?		didate Site Name and reference if known) eference:
3e - Please set out your representation below: Rydych yn son am gyfoethogi bywyd y gymuned ond wrth1. Does dim adeilad cymwys ar gyfer ar gyfer Canolfan le		rydych yn ymddifadu'r gymdeith	as o adeilad cymwys sydd a'i angen ar	r y gymdeithas.
2. Roedd Capel Baptist Dinas Powys arfer cyfarfod yno ne	es i'r awdurdodau eu taflu allan. D	Does dim cartref ganddynt. Mae	nhw'n gorfod cyfarfod yn Neuadd y Plw	vyf a dydy hwnnw ddim ar gael bob Dydd Sul.
3. Mae'r clwb soccer angen mwy o gaeau. Mae cyfleuster	au yno ar gyfer ymarfer a chwara	e.		
4. Mae gym da yn yr ysgol . Eto mae bobl yn gorfod chaw	arae bowls a squash yn Neuadd	y Plwyf achos does na 'r un lle a	arall iddynt yn y pentref.	
5. Rydych yn som am waith yn yr ardaloedd i arbed teithio	o. Mae cyfleus terau yn yr ysgol i	gael gweithdai.		
English translation				
You talk about enriching community life but in seeking to	demolish St Cyres School you are	e depriving the area of a suitable	e and much needed building.	
 There is no suitable building for the Health Centre at Di Dinas Powys Baptist Chapel used to meet there until th The soccer club needs more fields. There are practice The school has a good gym, yet people have to play bo You talk about (creating) work in the area so that people 	e authorities threw them out. The and play facilities there. owls and squash in the Parish Ha	Il as there is nowhere else for th	em in the village.	is not always available on a Sunday.
3f - Please outline the changes you wish to see made to the D Gwelir uchod.	eposit Plan to make it sound (if re	elevant)		
English Translation				

(ordered by Representation ID No.)

Representor ID and details: 4957/DP6 Janie Jones

See above.

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



Representor	D and d	etails:	4958/D	P1 Honora Ann Whit	e								
Date Lodged 02/04/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Eform		your comments to be k at a hearing session		n representations' or do on? Written		
2a - Do you consider the LDP is Sound? Unsound				Unsound	2b - If you think that t Procedural Tests -	o - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. rocedural Tests - P1 - Yes P2 - Unanswered							
					Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Unans	swered C4 - Yes				
					Coherence and Effec	tiveness Tests -	CE1 - Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	ered		
3a - Which pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:	<u>Para</u>	graph Number:	Proposal Map:	2	Constraints Map	Appendices:		
					MG2(27)			MG2		Conservation Area			
3b - Do you wi	sh to se	e any ch	nanges ma	de to the Deposit Plan	as a result of your rep	presentation? Ye	es (I	If "No" or "Unanswered	d" - go to 3d)				
3c - What cha	nges wo	uld like	to see mad	de to the Deposit Plan	? New Policy: Unanswered	Amended Policy Unanswered	<u>New Paragraph:</u> Unanswered	Amended Paragra Unanswered	ph: New Or Amender Yes	d Site: Other (see Note of the Control of the Contr			
					Notes:								
3d - If your re	presenta	ition rela	ates to a no	ew, deleted or amende	ed site, did you submit Site Name:	the site as a Cand	idate Site? Unanswe	ered (If "Yes", plea	ase give the Candidat Site Refere		erence if known)		
	ed traffic assessm flooding	hazard. nent is u to neig	ınsound. hbouring p	properties.	blic transport, access	to schools and me	dical centres, affect on	surrounding areas and	I conservation areas.				
			es you wish	n to see made to the D the plan	eposit Plan to make it	sound (if relevant)							
4h - If you wis	to sne	ak nles	se confirm	which part of your rer	presentation you wish	o speak to the inst	nector about and why t	hey consider it he nece	secary to speak at the	hearing -			

(ordered by Representation ID No.)

Representor ID and details: 4959/DP1 Mr Alan G. Tarr								_ '
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	e Additional SA SEA		<u>Rep fo</u> Eform	ormat:	,	,	to be consiered by 'writte ession of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unso	und and does not i		ne or more test(s	of soundness, ple	ease indicate which test(s) that it fails.
	Consistency Tests - Coherence and Effect			No	C3 - No E2 - Yes	C4 CE3 - No	- No CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Area Objectives		aragraph Number:		oposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your rep	resentation?	Yes	(If "N	lo" or "Unanswe	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plar	n? New Policy: No	Amended Po Yes	licy: <u>New Para</u> No	igraph:	Amended Parag	<u>raph:</u> <u>New Or An</u> No	nended Site: Other (see No	Notes):
	Notes:							
3d - If your representation relates to a new, deleted or amend	ed site, did you submit t Site Name:	the site as a Ca	andidate Site?		(If "Yes", p	· ·	ndidate Site Name and re Reference:	ference if known)
3e - Please set out your representation below: The proposal for St Cyres School site being utilised for n	ew housing.)				
This is totally ludicrous in my opinion. The road leading ucars parked at both sides of the road due to no off road paraffic bottleneck.								
If 300 plus houses are to be built at St Cyres site then Goof Murch Road - this is for approximately 300/400 yards to								
Not to mention the traffic "knock on effect" this would have of the Merrie Harriers / Redlands Road traffic lights - alre either!!) and this project cost millions of pounds and still	ady a nightmare even th	nough the Vale	have altered the re	oad many t	imes to include:-	lights, bus lane /	taxi lane (which is ridiculo	

Redlands Road traffic lights is just one problem. Then we have Pennytumpike Lane / Road - ditto there as above! People try to escape the traffic by going different routes but only to clog them up with increased car numbers and more chaos - well done planning!!

I really wonder what the planning department are thinking as it beggers belief to be honest. You don't need a PHD to work it out guys.....

The bottom line is this:More houses = more cars/ traffic
More traffic = better roads
Better roads = no traffic congestion

But with the roads we are stuck with, Dinas Powys cannot cope with hundreds and hundreds more cars - surely you agree with this basic fact??

I strongly object to the St Cyres School site being developed due to "Traffic Congestion" pure and simple and it will be chaos every morning and every night. Not to mention the noise and fuel pollution levels, potential accidents, that will be increased percentage wise, due to extra traffic both to cars and more worrying to people and young children.

A road (one way) proposal going towards the Sully lanes and ultimately Redlands Road won't work either. Nor will a road through Windyridge as this merely joins back on to Murch Rd or Hebron Hall end of

(ordered by Representation ID No.)

Representor ID and details: 4959/DP1 Mr Alan G. Tarr

Cardiff Rd. A road through Castle Drive area is also useless too as this just comes back to Murch Rd!! Cardiff Road / Murch Road junction / lights will be bedlam too for obvious reasons!

What is going on here? What is the planning authority thinking - wake up and smell the coffee - unless you have good main roads to deal with the increased traffic "Nothing" will solve the problems we "already have" never mind the proposals, and you will be creating a "Monster" if you allow 300 plus new homes and 750 more cars +/- onto; Murch Crescent / Murch Road / Cradiff Road - please think again and come up with something better as the whole of the Much residents are all dead against this illogical proposal for all the reasons set out herein.

I predict and forsee total carnage and horrendous chaos in Murch Rd / Murch Crescent / Cardiff Road if this goes ahead, I honestly do.

I also wonder if this is somehow corrupt from a 'financial perspective' and whose palms are being greased and if this does get the green light - then I think my concerns will be borne out as nothing or no one in their right mind would agree too or give this hidious proposal permission to go ahead.

Alan Tarr

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) Cancel proposals now for ANY new homes to be built at the - St Cyres site in Dinas Powys due to increased; traffic congestion, noise, pollution and increased danger to residents both young and old by increased traffic which is inevitable with new homes.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -Traffic volume.

Representor	ID and	details:	4960/D	P1 Michael Carter									
Date Lodged 02/04/2012		Petiti	ion and No. 0	Supporting Evidence	Additional SA SEA			Rep fo Eform	rmat:			to be consiered by 'writte ession of Public examinat	n representations' or do ion? Do not speak at he
2a - Do you o	onsider	the LDP	is Sound?	Unsound	2b - If you think that the Procedural Tests -	ne Plan is uns P1 - No	ound and	does not r P2 -		t one or more test(s)	of soundness, p	lease indicate which test(s	s) that it fails.
					Consistency Tests -	C1 - Yes		C2 -	No	C3 - No	C ₂	1 - No	
					Coherence and Effect	iveness Tests	- CE1 -	No		CE2 - Yes	CE3 - No	CE4 - No	
3a - Which pa	art of the	Deposi	t Plan are y	ou commenting on?	Policy Number:		Paragraph	Number:		Proposal Map:	,	Constraints Map	Appendices:
3b - Do you v	ish to s	ee any c	hanges ma	ade to the Deposit Plan	as a result of your rep	resentation?	Yes		(I	f "No" or "Unanswere	ed" - go to 3d)		
3c - What cha	anges w	ould like	to see mad	de to the Deposit Plan?	New Policy: Yes	Amended F No		New Para No	graph:	Amended Paragr No	aph: New Or Ai	mended Site: Other (see No	Notes):
					Notes:								
3d - If your re	epresen	tation rel	lates to a n	ew, deleted or amende	ed site, did you submit Site Name:	the site as a C	Candidate	Site?		(If "Yes", plo	J	andidate Site Name and re Reference:	eference if known)
3e - Please s	set out y	our repr	esentation	below:					V	y			
commu	ing time	s.The u	nverified Ar	e housing development nnual Average Nitroger still over 40ugm3. With	Dioxide levels at part	ts of Windsor	Road and	Marine So	cene ar	e 43.6 and 43.4 ugms	dlands Road are s. The bias corre	already heavily congeste ction for years 2008 to 20	d with gridlock at peak 10 was 0.85 so if this
Addition	al home	s at Dir	nas Powys	and Llandough will cau	se gridlock at the jund	ctions of The M	∕lerrie Har	riers and E	Barons (Court resulting in still	further pollution.		
		•	•	n to see made to the D not taken into conside			,	. I do not	believe	the LDP should be al	lowed to progres	s until this issue has beer	n addressed.
4b - If you w	sh to sp	eak, ple	ase confirm	n which part of your rep	presentation you wish t	o speak to the	inspector	about an	d why th	ney consider it be ned	essary to speak	at the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4961/DP1 Mr V. Kacal							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	•	•	to be consiered by 'writter ession of Public examination	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		d does not not me P2 - No	et one or more test(s)	of soundness, ple	ease indicate which test(s)) that it fails.
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4	- Yes	
	Coherence and Effect	tiveness Tests - CE1	- No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:	,	Constraints Map	Appendices:
	SP11	5.77 - To Leisure.	urism and 				
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes		(If "No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	? <u>New Policy:</u> No	Amended Policy: No	New Paragraph: No	Amended Paragr No	aph: New Or Am Yes	nended Site: Other (see No	 Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site?	(If "Yes", pl	· ·	ndidate Site Name and ref	ference if known)

3e - Please set out your representation below:

Proposed Developments in Penarth, Dinas Powys and Sully

The proposals for the developments in the Penarth, Sully and Dinas Powys areas, namely Site Nos. MG2(16), MG2(17), MG2(19), MG2(20) and MG2(25) are unsound because they are not accompanied by any proposals for meeting the transport requirements that will be generated by those developments. The proposals state that it will be up to the developers of each site to undertake transport assessments as part of the planning process. However, the impact of each site on the transportation network taken individually will be much less than the total impact of the sites taken together. The area must be considered as a whole.

Penarth, Dinas Powys, Sully and much of Barry are effectively dormitory suburbs of Cardiff and the A4055 corridor is the main route into Cardiff for commuters and the traffic signalled junction at the Merrie Harriers, where the A4055 and Redlands Road converge, is a serious bottleneck. The junction is already operating beyond its capacity at peak times and often at other times as well. The cumulative effect of the traffic generated by the developments that are proposed would lead to even more congestion. Thus, an overall transport assessment has to be undertaken by the Vale of Glamorgan Council and improvements have to be implemented in the transport infrastructure before any development proposals can be considered for the area as a whole. It is unrealistic to rely on individual developers to undertake the necessary transport infrastructure improvements.

Proposed Development of Site No. MG2(19) in Dinas Powys

The proposal to develop the St. Cyres School land in Dinas Powys, Site No. MG2(19), is unsound. Dinas Powys is divided by the railway line with only one major access to the highway system at the traffic signalled junction of the A4055 Cardiff Road with Murch Road. There is another access at its junction with Cross Common Road, but it is defective withCross Common Road crossing a narrow and weak bridge in the immediate approach to the A4055. The main access remains the traffic signalled junction and that is already operating at its capacity at times and the congestion will be exacerbated by the traffic generated by this development and the one proposed at Carleon Road, Site No. MG2 (20).

Paragraph 2.5.4 of Manual for Streets 2 states "In order to achieve connected growth, urban extensions should link in to the surrounding network of local and strategic routes. Developments with only one or two means of access should be avoided as they segregate existing and new development,". As it now exists, Dinas Powys south of the railway already fails to meet this recommendation. Further expansion southwards will make this shortcoming even more significant.

The above recommendation of Manual for Streets 2 is also relevant to the development of the St. Cyres School site itself. There is only one access to this site, namely Murch Road and Murch Crescent, reference to which is omitted from the LDP Report. The suggestion that Windy Ridge could be investigated as a secondary access is unrealistic. Apart from the difficulty of providing a safe and satisfactory junction with Murch Road/Murch Crescent, both the vertical and horizontal alignments of Windy Ridge are unsuitable for anything more that the residential access which it currently serves. No other access to

(ordered by Representation ID No.)

Representor ID and details: 4961/DP1 Mr V. Kacal

the site is feasible and, therefore, the access recommendation of Manual for Streets 2 cannot be met.

The problems of expanding Dinas Powys to the south of the railway are self evident and Site Ref. MG2(19) probably suggested itself as a potential site for housing development only because The Vale of Glamorgan Council will need to find an alternative use for the site of St. Cyres School after it is closed. Such development would be contrary to Policy SP11 – Tourism and Leisure, paragraph 5.77 of which states that "The LDP provides a policy framework which encourages new investment in appropriate tourism, leisure and recreation facilities and to protect and enhance existing facilities to the benefit of residents, visitors and the local economy." The demolition of the existing school buildings and building over of the playing fields is clearly contrary to this policy and would result in a loss of these valuable amenities to the residents of Dinas Powys.

The development of Site MG2(19) is unsound for the following reasons:

- (1) It fails to comply with the access arrangements recommended in Manual for Street 2 in respect of the site itself and will not improve the compliance with respect of Dinas Powys south of the railway Powys.
- (2) It will increase congestion at the traffic controlled junction of Murch Road with the A4055.
- (3) Contrary to Policy SP 11, paragraph 5.77, it will lead to the loss of valuable amenities to the residents of Dinas Powys by the demolition of the St. Cyres School buildings and the destruction of the playing fields.

The proposal to develop Site Ref. MG2 (19) should, therefore, be withdrawn from the proposed LDP.

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

Representor ID and details: 4962/DP1 Janet Secluna Th	nomas & Michael Wende	ell Thomas					
Date Lodged 02/04/2012Status MPetition and No.Supporting Evidence000	Additional SA SEA		Rep format: Eform	, ,	at a hearing sessi	ion of Public examination	n representations' or do on? Speak at hearing
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests - Consistency Tests -	e Plan is unsound and o P1 - Yes C1 - Yes veness Tests - CE1 -	does not not mee P2 - No C2 - No	t one or more test(s) of s	soundness, pleas	e indicate which test(s)) that it fails.
3a - Which part of the Deposit Plan are you commenting on?		<u>Paragraph</u> 5.62 - Tran	Number:	Proposal Map:)	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Yes	(If	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: No Notes:		New Paragraph: Yes	Amended Paragraph No	h: New Or Amen No	ded Site: Other (see N	Notes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit tl Site Name:	ne site as a Candidate S	Site?	(If "Yes", pleas	se give the Candid Site Refe	date Site Name and reference:	ference if known)
3e - Please set out your representation below: Over the past 20 years or more Councils for this area have referred to in para 5.64 and the Council has concluded the increase the throughput capacity of existing main roads as horse-riders and walkers. The Council's plans and propose unwarranted priorities to walking and cycling or buses. We lt is extremely important that the Vale of Glamorgan deverorward, urgently, proposals to improve road traffic throug Culverhouse Cross and onwards to the M4. Proposals to increases in road traffic demand on the A4055 and A 405 on key routes between the Vale of Glamorgan, Cardiff an ensure that congestion is severely reduced by developing	at this scheme is unlikely and restricting traffic throsals for example to the Foundaries of the Foundaries of the Foundaries and the scheme at the scheme a	ly to come to fruition by rugh minor and unclassing Regional Transport Plan d for these show that property Network that is capaba in road from Merrie Harm the St. Athan area and amount to an estimated asportation network." (p	2026. In the light fied roads which a will give high pri ovision needs to the of adequately riers through to D the development 41,400 movement ara 3.14). A mor	of this the Council will pare unsuitable for existing inity to the types of transhe improved or expandent meeting transport needs tow Corning Industrial Expenses of the rail link to Cardiffents into and out of the Views	orepare to invest a ng traffic or improves sport that residented, this will be con- to that are planned state (A4055) and If Rhoose Airport of ale daily. "The re-	additional, substantial fivements and are causing the choose to use and was idered on a cost effect to increase sharply. The from Barry Port Roadetc. cannot be relied or usult of this commuting	unds in major changes to ng danger to cyclists, will not presume ctiveness comparison. the Council will bring the lalong the A 4050 to not prevent further is peak time congestion
3f - Please outline the changes you wish to see made to the D Insert the above at 5.64	Deposit Plan to make it s	ound (if relevant)					
4b - If you wish to speak, please confirm which part of your re Para. 5.64	presentation you wish to	speak to the inspector	about and why th	ney consider it be neces	sary to speak at th	he hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4963/DP1 Malcom Ratcliff							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	•	•	o be consiered by 'writter ssion of Public examinati	•
•	2b - If you think that the Procedural Tests -		and does not not me	et one or more test(s)	of soundness, plea	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 -	No	
	Coherence and Effect	iveness Tests - C	E1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragr</u>	raph Number:	Proposal Map:		Constraints Map	Appendices:
	SP9						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: No	Amended Policy: Yes	New Paragraph: No	Amended Paragra No	aph: New Or Am	ended Site: Other (see I	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name:	the site as a Candid	ate Site?	(If "Yes", ple	J	didate Site Name and re eference:	ference if known)
				_			

3e - Please set out your representation below:

Local Development Plans, consideration should be given to whether the factors in Box 1 above give rise to any requirement for resource allocations."

Box 1 advises that the RTS assessment "...does not take fully into account factors that may be material to the ensuring (sic) an adequate supply of aggregates obtained from appropriately located sources. Such factors include:-

- •The technical capability of one type of material to interchange for another.
- •The relative environmental cost of substitution of one type of material by another.
- •The relative environmental effects of changing patterns of supply.
- •Whether adequate production capacity can be maintained to meet the required supply.

In our view that Deposit LDP does not give adequate attention to the last of the factors listed, that of maintaining adequate production capacity.

The RTS puts Bridgend and Vale of Glamorgan together for apportionment purposes, which it is stated is done for the purpose of preserving confidentiality. Although authorities are urged to collaborate on sharing apportionments, there is no suggestion in RTS that there is any market related, geological or other intrinsic reason for the pattern of apportionments suggested. It is merely a convenience. The RTS analysis also notes that "...the bulk of reserves are in the Bridgend and the greatest production is in the Vale of Glamorgan. On a per capita basis, both have adequate reserves, but on the basis of existing shares Bridgend is well provided for, but the Vale of Glamorgan is close to the limit."

Vale of Glamorgan also uses the last three years' sales figures to calculate its landbank and concludes that this is sufficient. However, the authority has given insufficient attention to the fact that such figures represent the longest and most severe economic conditions this country has faced since the Second World War. In other words, it is atypical. We believe the authority has been complacent in its assessment of likely future trends in sales. We are concerned that overreliance on a current sales average coupled with no flexibility in provision could leave the South Wales economy vulnerable to shortages of vital construction materials in an upturn. Vale of Glamorgan propose to leave any future assessment of need in the event of an upturn to later in the plan period, but we are concerned that if an important quarry is due to close in 2016, this approach will leave a shortage of available options since once production capacity is lost it will be difficult if not impossible for it to be regained.

Vale of Glamorgan admits that there is an unequal distribution of reserves between sites, and mentions that one site in particular, which has traditionally been the largest producer in the district, will be exhausted by 2016. Nevertheless, Vale of Glamorgan is not proposing any new allocations for limestone working, assuming that either other quarries in the area are capable of increasing production to compensate, or that inactive quarries will take up the shortfall, or that Bridgend will take up any shortfall.

There is no evidence that other producers are capable of increasing capacity to compensate or that they would even if they could. The plan tales a naïve view of modern mineral operations. A large limestone

(ordered by Representation ID No.)

Representor ID and details: 4963/DP1 Malcom Ratcliff

quarry is an integrated operation typically serving several downstream businesses such as coated stone plants and concrete production units. Typically, only a minority of stone is sold on the open market at the gate. If a company runs out of mineral to serve its fixed outlets it merely switches supply to one of its other quarries. Thus only if the substitute quarry is in the same ownership will the lost production be taken up by other units. Experience shows that when capacity is lost in any area, only some is shared between other quarries in the area. What usually happens is that production is likely to be either permanently lost or will transfer permanently to another area in the same ownership.

The mpa assumes that either of two quarries will take up the shortfall but it admits that one quarry is currently held in reserve for industrial purposes and one is held in reserve by a current producer. There appears to be an assumption that it is a simple matter to increase production at a site depleting it a more rapid rate and shifting production to another site at an equally rapid rate whilst ignoring the fact that to do so will undoubtedly affect the return on capital invested in those sites. In other words, there is no evidence that the industry will be willing to respond in the way that the authority assume.

Whilst Bridgend does have a surfeit of reserves, these are overwhelmingly contained in one site which is already the largest in South Wales. It is subject to an ongoing mineral review and it is admitted by the mpa that constraints on existing production capacity may limit the contribution that Bridgend can make. In these circumstances, we believe the authority's strategy is fundamentally flawed and that the outcome of its decision not to replace lost production capacity either with extensions or a new site, will be to permanently affect the ability of the district to supply a steady and adequate supply of aggregates in the long term contrary to the advice of the RTS.

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

We therefore propose, that the policy be amended as follows, (insertions in bold; deletions in strikethrough)

POLICY SP 9 - MINERALS

IN MEETING LOCAL AND REGIONAL NEED FOR THE PROVISION OF AGGREGATES, THE PLAN ENSURES THAT A MINIMUM OF 10 YEARS EXTENDED LAND BANK WILL BE MAINTAINED THROUGHOUT THE PLAN PERIOD. THIS IS ACHIEVED THROUGH:

- 1. MAINTAINING ADEQUATE PRODUCTION CAPACITY AT EXISTING SITES TO MAINTAIN THE IDENTIFIED SUPPLY AND BY ALLOCATING ADDITIONAL RESERVES TO COVER ANY IMPENDING SHORTFALL.
- 2. SAFEGUARDING EXISTING PERMITTED RESERVES OF LIMESTONE FROM DEVELOPMENT THAT WOULD PREJUDICE THEIR FUTURE EXTRACTION:
- 3. FAVOURING PROPOSALS WHICH PROMOTE THE SUSTAINABLE USE OF MINERALS AND ENCOURAGE THE USE OF SECONDARY AND ALTERNATIVE RESOURCES AND
- 4. THE SAFEGUARDING OF RESOURCES OF LIMESTONE, SAND AND GRAVEL WHERE THESE COULD BE WORKED IN FUTURE WITHOUT UNACCEPTABLE DETRIMENT TO THE ENVIRONMENT OR RESIDENTIAL AMENITY.

Consequential changes will also need to made to paragraph 7.98.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing All of it. The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and ready-mixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar.

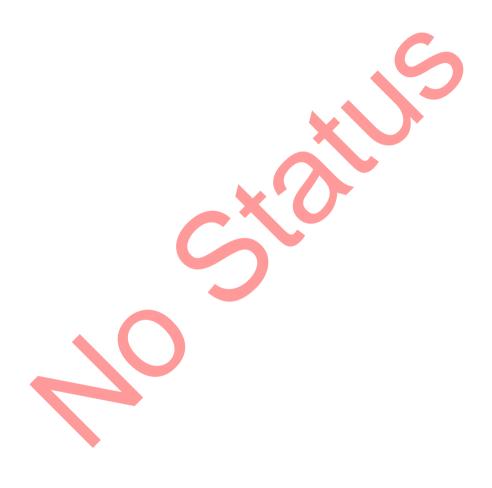
Representor ID and details: 4963/DP2 Malcom Ratcliff							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	you want to speak	at a hearing ses	be consiered by 'writter sion of Public examination	on? Speak at hearing
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that th Procedural Tests -	e Plan is unsound and P1 - No	does not not meet P2 - No	one or more test(s) of	f soundness, plea	se indicate which test(s)	that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 -	No	
	Coherence and Effection	veness Tests - CE1 -	- Yes	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG24(1)	<u>Paragraph</u> 	<u>Number:</u>	Proposal Map:)	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plar		esentation? Yes	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan		Amended Policy:	New Paragraph: No		oh: New Or Ame No	nded Site: Other (see N	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit tl Site Name:	he site as a Candidate	Site?	(If "Yes", plea	· ·	lidate Site Name and ref ference:	erence if known)
Policy MG24 We object to this policy on the basis that it is INCONSIST whether it will be worked in the near future) against non not sterilisation of the remaining for the long term is allowed to correct approach (recommended by BGS) is that the entities policy and safeguard all limestone resources for the local state of the Constant of the Constan	nineral development for to happen. Neither is it a re resource of economicing term.	the long term. There is appropriate to consider mineral needs to be second (if relevant)	no point in only sa environmental con afeguarded agains	afeguarding some reso estraints in safeguardir	ources for the nea	r future when the possib n should be free of such	ility of the irrevocable considerations. The
POLICY MG 24 – DEVELOPMENT IN MINERALS SAFE		a, deletions in strikethic	ougn)				
THE FOLLOWING MINERAL RESOURCES ARE SAFE	GUARDED FROM ALL F	FORMS OF PERMANE	NT BUILT DEVEL	OPMENT:			
LIMESTONE 1.LAND TO THE SOUTH OF PANTYFFYNNON QUARR 2.LAND TO THE NORTH-WEST OF PANT QUARRY AN 3.LAND TO THE SOUTH OF RUTHIN QUARRY.	,						
THE ENTIRE LIMESTONE RESOURCE OF VALE OF G	LAMORGAN						
SAND AND GRAVEL 4.TWO AREAS TO THE NORTH OF CITY (SG1 AND SO 5.FOUR AREAS IN THE UPPER THAW VALLEY (SG3, 6.FIVE AREAS IN THE ELY VALLEY (SG7, SG8, SG9, S	SG4, SG5 AND SG6) A	ND					
THE ENTIRE SAND AND GRAVEL RESOURCE OF VAI	LE OF GLAMORGAN						

(ordered by Representation ID No.)

Representor ID and details: 4963/DP2 Malcom Ratcliff

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

All of it. The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and ready-mixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar.



Representor ID and details: 4963/DP3 Malcom Ratcliff							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform				representations' or do on? Speak at hearing
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound an P1 - No	d does not not mee P2 - No	et one or more test(s) of so	oundness, please	indicate which test(s)	that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 - N	0	
	Coherence and Effec	tiveness Tests - CE	1 - Yes	CE2 - Yes (CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	ph Number:	Proposal Map:		Constraints Map	Appendices:
		7.100 - 1	Minerals				
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If "No" or "Unanswered" -	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy:	New Paragraph:	Amended Paragraph:	New Or Amend	ed Site: Other (see N	 lotes):
	No	No	No	Yes	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit Site Name:	the site as a Candidat	e Site?	(If "Yes", please	give the Candida Site Refer	ate Site Name and reference:	erence if known)
3e - Please set out your representation below: Paragraph 7.100 (Buffer Zones)							
The approach to setting Buffer Zone distances for individulisted in Table 3 of the MBP are generous compared to the proposals, where the distance would extend outward from this Is not reflected in paragraph 7.100 which needs amer mineral is not sterilised unnecessarily or operations const	e minimum distance of any existing sensitive adment in order to prov	f 200m for hard rock of development. Although	uarries recommend the policy is flexi	ded in MTAN 1 this is a do ible in allowing developmen	uble edged sword nt where it would	d when it comes to any not impact mineral wo	y new quarrying orkings and vice versa,
3f - Please outline the changes you wish to see made to the D Accordingly, we propose that paragraph 7.100 be amended		`	strikethrough)				
7.100 The operation of mineral workings frequently conflict to mineral workings can severely constrain the ability of motion between the mineral operation and other sensitive land us permitted unless it can be demonstrated that there will be acceptable where it can be demonstrated that such propo-	ineral resources to be es such as residential no adverse impact on	worked. In order to prareas, hospitals and the new development	ovide areas of proteschools. Within the or the mineral wor	ection around mineral work identified buffer zones, no king. Other less sensitive of	kings buffer zone new mineral dev	s have been identified relopment or sensitive	to reduce the conflict development will be
4b - If you wish to speak, please confirm which part of your rep All of it. The Mineral Products Association is the principal production and 95% of GB asphalt and ready-mixed conc	trade association repr	esenting the quarrying	industry in Great E	Britain. Our members repre	sent 100% of GE	s cement production, 9	

Representor ID and details: 4963/DP4 Malcom Ratcliff							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA		Rep format: Eform	,	,	o be consiered by 'written ssion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	e Plan is unsound and P1 - No	does not not mee	et one or more test(s)	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4	· No	
	Coherence and Effective	veness Tests - CE1 -	Yes	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:		Constraints Map	Appendices:
							Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Yes	(1	f "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: No		New Paragraph: No	Amended Paragra	aph: New Or Am No	ended Site: Other (see I	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name:	ne site as a Candidate	Site?	(If "Yes", ple		didate Site Name and re eference:	ference if known)
3e - Please set out your representation below: Mineral Background Paper & MSAs on Proposals Map							
We strongly object to 8.3 in the MBP which infers a strong in relation to Policy MG24 that ' Neither is it appropriate to working Grade 2 or 3a agricultural land. If the approach in regional supplier of carboniferous limestone. This objection	consider environmenta 8.3 became policy it wo	al constraints in sa <mark>fegua</mark> ould see an end to any	arding decisions ', proposals for a n	, but I think we need to ew quarries within the	o go further, by ob Vale. At 2.1 of th	jecting to 8.3. There is n	o absolute bar on
3f - Please outline the changes you wish to see made to the D Accordingly, we propose the deletion of the reference to E		onsequential changes t				the extent of the MSAs.	
4b - If you wish to speak, please confirm which part of your repart All of it. The Mineral Products Association is the principal production and 95% of GB asphalt and ready-mixed concepts.	oresentation you wish to trade association repres	speak to the inspector senting the quarrying in	about and why the dustry in Great B	hey consider it be nec ritain. Our members r	essary to speak a epresent 100% of	GB cement production,	

Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS: (ordered by Proposition 1)

(ordered by Representation ID No.)

Lodged D4/2012 Status M Petition and No. Supporting Evidence 0 0 0 0	e Additional SA SEA		Rep format: Eform	,	,	to be consiered by 'writter ession of Public examinati	•
Oo you consider the LDP is Sound? Unsound	2b - If you think that the	ne Plan is unsour	nd and does not not me	eet one or more test(s) of	of soundness, ple	ease indicate which test(s) that it fails.
	Procedural Tests -	P1 - No	P2 - No				
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
	Coherence and Effect	iveness Tests -	CE1 - No	CE2 - No	CE3 - No	CE4 - Yes	
Vhich part of the Deposit Plan are you commenting on?	Policy Number:	<u>Par</u>	ragraph Number:	Proposal Map:		Constraints Map	Appendices:
Do you wish to see any changes made to the Deposit Pla	ın as a result of your rep	resentation? Y	es ((If "No" or "Unanswere	d" - go to 3d)		
What changes would like to see made to the Deposit Pla	n? New Policy:	Amended Police	cy: New Paragraph:	Amended Paragra	aph: New Or An	nended Site: Other (see I	Notes):
	No	Yes	No	No	Yes	No	
	Notes:						
	dad sita, did you submit	the site as a Can	didate Site? No	(If "Yes", ple	J	ndidate Site Name and re	ference if known)
If your representation relates to a new, deleted or amend	Site Name:				Site F	Reference:	

Town Centre Car Park

1.2 The proposed redevelopment of land to the rear of the former Vale of Glamorgan Brewery will facilitate a larger town centre car park (approx. 400 spaces) to serve Cowbridge. The proposed allocation of the former Cowbridge cattle market for housing (Policy MG2 - site 11) will reduce the overall car parking provision within the town. It is acknowledged by the Council at Section 5 Area Objectives of the draft LDP that there is a requirement to promote development proposals, which provide opportunities for additional or improved parking facilities. The proposed car park will provide an enhanced car parking facility and seek to address this shortfall.

Residential

- 1.3 Part of the site represents an opportunity to deliver much needed market, intermediate and affordable housing in Cowbridge. The November 2010 Vale of Glamorgan Joint Housing Land Availability Study (JHLAS) identifies just a 3.3 year housing land supply. Technical Advice Note 1: JHLAS paragraph 5.1 states local planning authorities must take steps to increase the supply of housing land where a supply of less than 5 years is identified, including reviewing the development plan.
- 1.4 The allocation of part of the site for housing in the development plan would contribute to the requirement to provide additional housing in the Vale of Glamorgan to achieve a 5 year housing land supply.

Tourism

- 1.5 In addition, the redevelopment would provide an opportunity for a new hotel to support the tourist industry within the Vale. Paragraph 6.42 of the draft LDP acknowledges that the provision of well located and designed tourist facilities present a significant opportunity to bring new investment into the Vale of Glamorgan.
- 1.6 The provision of new hotels within the key settlements is a key element of both the Council's Tourism strategy and LDP. Point 6.30 of the Vale Tourism Strategy 2011-2015 identifies Cowbridge as a location capable of attracting visitors but is constrained by the lack of car parking and the choice of visitor accommodation. The proposed allocation will address each of these identified issues.

Supporting Retail

(ordered by Representation ID No.)

Representor ID and details: 4964/DP1 Antwerp Developments

1.7 The supporting retail element will enhance the range and choice of retail facilities within Cowbridge, thus reducing the need to travel by car to retail destinations further afield.

Employment

1.8 The proposed hotel and retail element will not only enhance visitor choice and the attractiveness of Cowbridge but will provide employment opportunities within the town.

Accessibility

1.9 The site itself is highly accessible by a variety of modes of transport. The site adjoins the Cowbridge bus terminus and is well located to public footpaths and cycleways.

Summary

1.10 In summary, the allocation and safeguarding of the site for a mixed-use redevelopment would deliver a number of benefits to Cowbridge, as follows:

Provide a 400 space car park to serve Cowbridge;

Provide a hotel to support the tourist industry within the Vale;

Create employment opportunities;

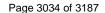
Contribute to much needed market, intermediate and affordable housing in the Cowbridge area; and

Provide additional retail choice.

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

The proposals map should allocate the site for a mixed-use scheme comprising a new town centre car park, residential development, hotel and supporting retail.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -We would wish to speak to the Inspector to discuss the allocation of the site for a mixed-use proposal. This would enable the issues to be discussed in greater detail.



Representor	ID and	details:	4965/D	P1 Richard Tonkin									
Date Lodged 02/04/2012		Petiti	on and No	Supporting Evidence	Additional SA SEA			<u>Rep fo</u> Eform		,	,	to be consiered by 'writte ession of Public examinat	•
2a - Do you c	onsider t	he LDP	is Sound?	Sound	2b - If you think that the Procedural Tests -	he Plan is ເ P1 - No		nd does not r P2 -		et one or more test(s) of	of soundness, p	lease indicate which test(s	s) that it fails.
					Consistency Tests -	C1 - No)	C2 -	No	C3 - No	C	4 - No	
					Coherence and Effect	tiveness Te	sts - CE	1 - No		CE2 - No	CE3 - No	CE4 - No	
3a - Which pa	art of the	Deposit	Plan are y	ou commenting on?	Policy Number:		Paragra	aph Number:		Proposal Map:		Constraints Map	Appendices:
					MG2(11)			Settlement hy					
3b - Do you v	vish to se	e any c	hanges ma	ade to the Deposit Plar	as a result of your rep	resentation	? Yes		(I	f "No" or "Unanswere	d" - go to 3d)		
3c - What cha	anges wo	uld like	to see ma	de to the Deposit Plan	? New Policy:	Amende	d Policy:	New Para	graph:	Amended Paragra	aph: New Or A	mended Site: Other (see	Notes):
					No	Yes		No		No	No	No	
					Notes:								
3d - If your r	epresent	ation rel	ates to a n	ew, deleted or amende	ed site, did you submit Site Name:	the site as	a Candida	ate Site?	((If "Yes", ple	J	andidate Site Name and re Reference:	eference if known)
3e - Please	set out yo	our repre	esentation	below:									
												er alia, Cowbridge and Lla 19 at item 6 on Cowbridge	
		•	•		eposit Plan to make it Cowbridge Cattle Mark	•		provided for	short st	ay parking.			
The imp	act of de	velopm	ent of the (Cowbridge Cattle Mark	oresentation you wish tet and its immediate element and the Trust ye	nvirons on	Old Hall G	ardens and t	he Tow	n Walls is of great cor	ncern to the Trus	st which is actively involve	ed with the refurbishment of

Representor ID and details: 4966/DP1 Mrs M Richmond							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		Rep format: Eform				n representations' or do on? Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	•	ne Plan is unsound and		t one or more test(s) o	f soundness, pleas	se indicate which test(s) that it fails.
	Procedural Tests -	P1 - Yes	P2 - Yes				
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	iveness Tests - CE1 -	No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(33)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan		Amended Policy:	New Paragraph:			nded Site: Other (see I	Notes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	he site as a Candidate	Site?	(If "Yes", ple	ase give the Cand Site Re	idate Site Name and re ference:	ference if known)
3e - Please set out your representation below: The proposal MG2 (33) for housing at St Nicholas does r Vale.	ot meet the councils LE	DP objectives, and acco	rding to the counc	cils sustainability appra	isal, would worser	n the environmental imp	pact of the citizens in the
The site is very large in relation to the village and would per that add to the congestion at Culverhouse Cross. Other						d residents are reliant o	n short car trips, most
I would like to see the Vale of Glamorgan council commt pollution (noise, light and air) and will result in more greek centres, parks, etc.							
3f - Please outline the changes you wish to see made to the DI would like MG2 (33) (housing proposal at St. Nicholas)							
4b - If you wish to speak, please confirm which part of your re	presentation you wish to	speak to the inspector	about and why th	ney consider it be nece	ssary to speak at	the hearing -	

Representor ID and details: 4967/DP1 Katy Willims							
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		Rep format: Eform	•	•	be consiered by 'written sion of Public examinati	n representations' or do on? Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	he Plan is unsound and P1 - No	does not not mee	et one or more test(s) of	of soundness, plea	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	tiveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(15)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation?	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	No No	Amended Policy: No	New Paragraph:	Amended Paragra	new Or Ame No	ended Site: Other (see I	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site?	(If "Yes", ple	J	didate Site Name and re eference:	ference if known)
3e - Please set out your representation below: The proposed site access is unsuitable as it runs past 3 s support these houses.	chools and through an	estate that us already	cluttered with cars	s twice daily due to the	schools. I do not	feel Llantwit Major has th	ne infrastructure to
3f - Please outline the changes you wish to see made to the D A different access point to the site, away from Ham Lane.	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	presentation you wish t	to speak to the inspecto	or about and why t	hey consider it be nec	essary to speak at	the hearing -	

Representor ID and details: 4968/DP1 Persimmon Home	es Ltd and Bellway Homes (Wales), c/o Agent - M	Michael	
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0			nents to be consiered by 'written representations' or do ring session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - U	P2 - Unanswered C2 - Unanswered C3 - Unanswered	
, ,	Policy Number: Paragraph N MG2(23)		Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan		red (If "No" or "Unanswered" - go to 3	
3c - What changes would like to see made to the Deposit Plan'	P New Policy: Amended Policy: New Policy:	ew Paragraph: Amended Paragraph: New	Or Amended Site: Other (see Notes): Iswered Unanswered
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site Name:	tte? Unanswered (If "Yes", please give the	he Candidate Site Name and reference if known) Site Reference:
On behalf of our clients Persimmon Homes Ltd and Bellw allocated under Policy MG2 – Housing Allocation 23 for 6 The site is presently allocated within the Unitary Developr phase (350 dwellings) of the development. The application The application was submitted in June 2010 and in Febru The application demonstrates: 1. that the site is eminently suitable for residential develop 2. that the framework for the future form of the site envisa 3. the Environmental Statement submitted with the applic terms of transport, drainage, air quality, noise, biodiversity 4. that satisfactory access to serve the entire site can be 5. a Desk Top archaeology study was submitted and conf 6. that Network rail have no objections to the developmen 7. that neither the Environment Agency or Welsh Water h by existing residential properties to the south of the railwas 8. that the comprehensive development of the allocation of In addition, a comprehensive s106 offer has been made to land. This includes open space, affordable housing, eduction of the specific properties and the inclusion of the subvey.	nent Plan and is the subject of an Adopted Deve in facilitates access to the remainder of the site a cary 2012 an appeal was lodged by our clients agrouped by the Council in their Development Brief is ation considered the cumulative development of or landscape; achieved via Pentir y De; irms that there are no constraints in terms of arc t subject to the diversion of the existing railway for ave any objections to the proposal which in term y line. I can be readily achieved. In the Authority which ensure that the impacts of the cation, and public transport provision.	elopment Brief. It is within this context that a plant a sets a framework for the comprehensive deviations at the non-determination of the application. and proposition for inclusion within the plan; achievable and will be facilitated; the whole site for up to 700 dwellings. This demonstrates are designed to accommodate up the development are dealt with fully and are control by Persimmon Homes Ltd and Bellway Homes	nning application was prepared and submitted for the first elopment of the allocation. constrated that there were no overarching constraints in to 700 dwellings and will reduce flood risk experienced inpatible with the long term development of the adjoining (Wales).
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector a		

Representor ID and details: 4969/DP1 Joseph Kuck							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - No	does not not mee	et one or more test(s) of	soundness, plea	se indicate which test(s)) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	Yes	
	Coherence and Effec	tiveness Tests - CE1	- No	CE2 - No	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	n Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	oh: New Or Ame	nded Site: Other (see N	<u>Notes):</u>
	Yes	No	No	No	No	Yes	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site? Unanswe	ered (If "Yes", plea	· ·	idate Site Name and ref ference:	rerence if known)
3e - Please set out your representation below: I reject this proposal for development on the St. Nicholas and the ratio of 8.5 houses to acre would be dramatically less expensive to repair and update the vacant and older The absence of village shops and services would mean find houses. There is no net demand for affordable housing in for residential development within Minor Rural Settlement problems with access and traffic flow on A48 during peak. St. Nicholas is an area of architectural and historic interest the Vale. Part of the site (the land north of the field previous it is difficult to understand why St. Nicholas site was not eat stage 3 if criteria were properly applied.	out of character with the properties in Barry and requent short car journ St. Nicholas and East ss. The Council's Highway times would be consider and such a proposal usly proposed for affor	ne Conservation Area V d more urban areas. This eysand this is contrary Vale, as recorded by the vay Engineers have adviterable. I believe that no would devalue the area dable housing) was not	illage. It would red s would also negation of Council Policy. the Council in its L ised that access the houses should the This proposal were a Candidate Site	quire significant infrastruate the need for expension Absence of such service MHA dated Nov 2010. From Ger-y-Lan is not applicate be built on brown sites, could encroach into the country was added by the Country and the site of the country and the countr	ucture to accomodive infrastructure. es would bepartrithis proposed de propriate to accomot green sites. ppen countryside council.	date the development are cularly relevant to reside velopment conflicts with modate additioinal reside and erode the green are	ents of affordable Council policy (MG 7) lential development. The
3f - Please outline the changes you wish to see made to the DI wish the proposal to be rejected.	eposit Plan to make it	sound (if relevant)					
4h - If you wish to speak please confirm which part of your re-	presentation you wish t	n sneak to the inspecto	r about and why t	hev consider it he nece	ssary to sneak at	the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4970/DP1 Clare Price							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		<u>Rep format:</u> Eform	•	•	to be consiered by 'writter ssion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		nd and does not not me P2 - Yes	eet one or more test(s) o	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
	Coherence and Effect	iveness Tests -	CE1 - No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Par</u>	ragraph Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(15)			MG2			
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your rep	resentation? Y	′es	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	New Policy:	Amended Police	cy: New Paragraph:	Amended Paragra	aph: New Or Am	ended Site: Other (see	Notes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Can	didate Site? Unansw	ered (If "Yes", ple	J	ndidate Site Name and re reference:	ference if known)

3e - Please set out your representation below:

I have reviewed the information available at the local council offices and listened to the comments from the council representatives at these exhibitions. I consider that the LDP is unsound regarding site MG2 (15) development of land to the rear of Heol y Felin and nant- yr- adar in llantwit major stretching to the rear of the trebeferad housing settlement for the following reasons.

1. the proposed access from ham lane east on to the road of potential highway access from nant yr adar is totally unsuitable for the increased volume of traffic from any additional traffic let alone the traffic associated with 300 plus houses. There is already a leisure center and 3 busy schools on the ham lane east road Llantwit major comprehensive school, Ysgol dewi sant (welsh medium seed school) and Llanilltud Fawr primary (with 200 plus pupils in attendance) the later being on the corner of the proposed access road. At school drop off and collection times the traffic situation is already unbearable and sometimes dangerous for children walking to and from school, with the road being totally blocked on occasion with parked cars and slow moving vehicles. This road is also subject to heavy plant and tractor traffic from the nearby Rosedew farm who use this road to leave the lower end of llantwit in the course of their work. The Catholic church sits opposite this same access junction and so at times of church service or congregation the road also suffers from additional congestion with the nearby roads being blocked up with parked cars of the congregation. The proposal to improve this area seems to not take into account of the current volume of traffic and the frequency of the current congestion in this area. Additionally I have been informed that they may introduce traffic lights or a roundabout at the top of ham lane east where it joins the Boverton road. This also seems to be totally impractical as this road (Boverton road) is lined with residential housing and does not have the space to accommodate either traffic lights or a roundabout given the recent development of land in the adjacent field for the new 'seed' welsh medium education primary school, ysgol dewi sant and the increasing building of classrooms for that circetion either.

To contemplate serving a development of this scale proposed by means of a single restricted and substandard access off Nant Yr Adar creating a potentially dangerous crossroads intersection, and further traffic issues in the adjoining road junctions and network is quite frankly laughable in highway safety and traffic terms.

It was mentioned at the exhibition in llantwit that i attended that other access points could be introduced at a couple of other locations to the site depending on who developed the land. This seems to me that the documents are wholly misleading and even the potential additional access points that were pointed out to me were woefully inadequate for a development of the proposed size.

- 2. The possible contamination of the Hodnant brook from both the the construction and further housing could be a major issue for the environment. Both the banks of the brook and the brook itself of a major environmental interest being the home of much of llantwit majors wildlife such as badgers, pheasants, kingfishers and herons etc. In addition to the pollution and disturbance to wildlife there is the potential felling of trees that would be necessary to create the access. The trees in the area make a valuable contribution to the environment. This stream forms a clear and sensible boundary to the residential area of llantwit and the wildlife and countryside of llantwit.
- 3. As the area lies in a C2 flood zone it is of concern that the flow of the stream could be disturbed. In the recent past and more distant there has been flooding of the ham manor residential caravan park which adjoins the site. The fact that lower parts of the site are indicated as being within a potential flood zone must also raise serious doubts about the desirability of developing this land for housing. Furthermore are suggestions locally that the land may contain features of archaeological interest which again may militate against the development of the site.

(ordered by Representation ID No.)

Representor ID and details: 4970/DP1 Clare Price

- 4. The service infrastructure of Llantwit major cannot cope with the volume of traffic in summertime with tourism as it stands currently and is stretched all year round in terms of healthcare, libraries, amenities and other community facilities. It is clear that the towns infrastructure simply cannot cope with another 300 plus houses from this site in addition to the 150 houses in the LDP for the other proposed llantwit major site, Plasnewydd. When the pentre cwrt estate was built in the 1990's on greenfield land no significant increase was seen in the local available facilities and the facilities in llanwit have been stretched to the max since then. This new proposed development would significantly increase the current strain further.
- 5. The land which is proposed for development at present forms natural and pleasant countryside for llantwit major which I understand is included within the boundaries of the heritage coast and which forms a strong natural backcloth to existing development in that area of the town. The published documents actually describe the proposed site as adjoining the Glamorgan heritage coast designated area which I believe is misleading.

I remain to be convinced that llantwit major needs to absorb the large scale of new development as proposed in the LDP for this site, particularly bearing in mind the scale of new development which has occurred in the town in recent years and other considerations such as the substantial scaling down of RAF/MOD St Athan and removal of the greater majority of service personnel from the base with the future hanging in the balance for the bases as a whole currently.

The plan identifies MG2(15) as a reserve site which will be brought forward for development if required. There is no explanation in the document as to what this actually means in real terms. and even if this land is only being considered for release towards the end of the plan period, it cannot be refuted that the LDP is firmly identifying this land now as a potential large scale housing site. This inevitably raised concern for local residents and creates planning blight. Housing proposal MG2(15) should therefore be deleted from the plan proposals now for the reasons stated above to eliminate uncertainty.

In my view this proposed development is wholly unsustainable, totally irresponsible and downright dangerous (in traffic terms) and would be completely contrary to good and sensible environmental and highway planning. I would appreciate confirmation that this form and contents have been received and taken into consideration.

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

 Housing proposal MG2(15) should therefore be deleted from the plan proposals now for the reasons stated above to eliminate uncertainty.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 4971/DP1 Ann Williams							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		Rep format: Eform	, ,	our comments to be con at a hearing session of	•	•
	2b - If you think that the Procedural Tests -		d does not not mee P2 - Yes	t one or more test(s) of	soundness, please indi	cate which test(s) the	hat it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 - No		
	Coherence and Effecti	iveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:	Cor	nstraints Map	Appendices:
	MG2(15)			MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	h: New Or Amended S	Site: Other (see No	otes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name:	he site as a Candidate	e Site? Unanswe	red (If "Yes", pleas	se give the Candidate S Site Reference		rence if known)
				-			

3e - Please set out your representation below:

I have reviewed the information available at the local council offices and listened to the comments from the council representatives at these exhibitions. I consider that the LDP is unsound regarding site MG2 (15) development of land to the rear of Heol y Felin and nant- yr- adar in llantwit major stretching to the rear of the trebeferad housing settlement for the following reasons.

1. the proposed access from ham lane east on to the road of potential highway access from nant yr adar is totally unsuitable for the increased volume of traffic from any additional traffic let alone the traffic associated with 300 plus houses. There is already a leisure center and 3 busy schools on the ham lane east road Llantwit major comprehensive school, Ysgol dewi sant (welsh medium seed school) and Llanilltud Fawr primary (with 200 plus pupils in attendance) the later being on the corner of the proposed access road. At school drop off and collection times the traffic situation is already unbearable and sometimes dangerous for children walking to and from school, with the road being totally blocked on occasion with parked cars and slow moving vehicles. This road is also subject to heavy plant and tractor traffic from the nearby Rosedew farm who use this road to leave the lower end of llantwit in the course of their work. The Catholic church sits opposite this same access junction and so at times of church service or congregation the road also suffers from additional congestion with the nearby roads being blocked up with parked cars of the congregation. The proposal to improve this area seems to not take into account of the current volume of traffic and the frequency of the current congestion in this area. Additionally I have been informed that they may introduce traffic lights or a roundabout at the top of ham lane east where it joins the Boverton road. This also seems to be totally impractical as this road (Boverton road) is lined with residential housing and does not have the space to accommodate either traffic lights or a roundabout given the recent development of land in the adjacent field for the new 'seed' welsh medium education primary school, ysgol dewi sant and the increasing building of classrooms for that circetion either.

To contemplate serving a development of this scale proposed by means of a single restricted and substandard access off Nant Yr Adar creating a potentially dangerous crossroads intersection, and further traffic issues in the adjoining road junctions and network is quite frankly laughable in highway safety and traffic terms.

It was mentioned at the exhibition in llantwit that i attended that other access points could be introduced at a couple of other locations to the site depending on who developed the land. This seems to me that the documents are wholly misleading and even the potential additional access points that were pointed out to me were woefully inadequate for a development of the proposed size.

- 2. The possible contamination of the Hodnant brook from both the the construction and further housing could be a major issue for the environment. Both the banks of the brook and the brook itself of a major environmental interest being the home of much of llantwit majors wildlife such as badgers, pheasants, kingfishers and herons etc. In addition to the pollution and disturbance to wildlife there is the potential felling of trees that would be necessary to create the access. The trees in the area make a valuable contribution to the environment. This stream forms a clear and sensible boundary to the residential area of llantwit and the wildlife and countryside of llantwit.
- 3. As the area lies in a C2 flood zone it is of concern that the flow of the stream could be disturbed. In the recent past and more distant there has been flooding of the ham manor residential caravan park which adjoins the site. The fact that lower parts of the site are indicated as being within a potential flood zone must also raise serious doubts about the desirability of developing this land for housing. Furthermore are suggestions locally that the land may contain features of archaeological interest which again may militate against the development of the site.

(ordered by Representation ID No.)

Representor ID and details: 4971/DP1 Ann Williams

- 4. The service infrastructure of Llantwit major cannot cope with the volume of traffic in summertime with tourism as it stands currently and is stretched all year round in terms of healthcare, libraries, amenities and other community facilities. It is clear that the towns infrastructure simply cannot cope with another 300 plus houses from this site in addition to the 150 houses in the LDP for the other proposed llantwit major site, Plasnewydd. When the pentre cwrt estate was built in the 1990's on greenfield land no significant increase was seen in the local available facilities and the facilities in llanwit have been stretched to the max since then. This new proposed development would significantly increase the current strain further.
- 5. The land which is proposed for development at present forms natural and pleasant countryside for llantwit major which I understand is included within the boundaries of the heritage coast and which forms a strong natural backcloth to existing development in that area of the town. The published documents actually describe the proposed site as adjoining the Glamorgan heritage coast designated area which I believe is misleading.

I remain to be convinced that llantwit major needs to absorb the large scale of new development as proposed in the LDP for this site, particularly bearing in mind the scale of new development which has occurred in the town in recent years and other considerations such as the substantial scaling down of RAF/MOD St Athan and removal of the greater majority of service personnel from the base with the future hanging in the balance for the bases as a whole currently.

The plan identifies MG2(15) as a reserve site which will be brought forward for development if required. There is no explanation in the document as to what this actually means in real terms. and even if this land is only being considered for release towards the end of the plan period, it cannot be refuted that the LDP is firmly identifying this land now as a potential large scale housing site. This inevitably raised concern for local residents and creates planning blight. Housing proposal MG2(15) should therefore be deleted from the plan proposals now for the reasons stated above to eliminate uncertainty.

In my view this proposed development is wholly unsustainable, totally irresponsible and downright dangerous (in traffic terms) and would be completely contrary to good and sensible environmental and highway planning. I would appreciate confirmation that this form and contents have been received and taken into consideration.

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

 Housing proposal MG2(15) should therefore be deleted from the plan proposals now for the reasons stated above.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 4972/DP1 Kate Isles							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examinati	n representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	ne Plan is unsound and P1 - No	P2 - No	et one or more test(s) of	f soundness, pleas	se indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	iveness Tests - CE1	- No	CE2 - Yes	CE3 - No		
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Amer	nded Site: Other (see I	Notes):
	Notes:	140	NO	No	103	140	
3e - Please set out your representation below: 1. Landscape impact - This is a greenfield site outside the Cowbridge from the South, from around Cowbridge and in 2. Access issues - there are issues, in particular if a secon road are clearly too narrow to cope with more traffic include.	boundary of Cowbridg particular from the Th	aw Valley. ss is required as Windn	00 houses will not	fit in with the landscape	e and will be clearl		, ,,
3. Sewerage works- There is a lack of capacity at these w	orks and currently the	e are periodic smells w	hich will only get v	worse if more houses a	re built.		
4. Special Landscape area - This site is part of a special L areas".	andscape Area whi <mark>ch</mark> i	in the Councils's own w	ords in policy MD	1, "new development sh	nould not have an	unacceptable impact or	n special landscape
Impact on Cowbridge - More houses means more cars the traffic lights on St Athan Road.	which will add more pr	essure on local services	s including school	ls, parking and congesti	ion - including at k	sey entry and exit points	s in Cowbridge such as
6. Public right of way footpath - This footpath is used and	valued by many people	e of all ages. If building	went ahead the d	character and route of th	nis public footpath	would undoubtedly cha	ange.
3f - Please outline the changes you wish to see made to the Di Have candidate site removed and include as a green wed		,	ons.				
4b - If you wish to speak, please confirm which part of your rep	resentation you wish t	o speak to the inspecto	r about and why t	hey consider it be neces	ssary to speak at	the hearing -	

Representor ID and details: 4973/DP1 M Board							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		Rep format: Eform			o be consiered by 'written is ssion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsour P1 - Yes	nd and does not not me P2 - Yes	et one or more test(s)	of soundness, plea	ase indicate which test(s) t	hat it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 -	Yes	
	Coherence and Effect	iveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Par</u>	agraph Number:	Proposal Map:		Constraints Map	Appendices:
	MD12	1.1.				Other - Not Listed FEB 2012	Appendix 9
3b - Do you wish to see any changes made to the Deposit Plan	n as a result of your rep	resentation? Y	es ((If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: No Notes:	Amended Police Yes	<u>New Paragraph:</u> No	Amended Paragra No	aph: New Or Ame Yes	ended Site: Other (see No No	otes):
3d - If your representation relates to a new, deleted or amend	ed site, did you submit t Site Name: Land eas		didate Site? Yes	(If "Yes", ple	-	didate Site Name and refe eference: MG9/ID22 Appe	•
3e - Please set out your representation below: Test P1 No consultation with emergency services and local	cal primary schools						
Test P2 The site does not meet with National Policy							
Test C1 No assessment of Gypsy and Traveller needs.							
Test C2 Rural site with no shops, bus services, medical s	services and school alre	eady oversurscrib	ed				
3f - Please outline the changes you wish to see made to the E Remove site MG9 from the plan.							
Policy MD12 needs to be amended since at present it dis	criminates against the	Gypsy and Trave	ller Community				
4b - If you wish to speak, please confirm which part of your re	presentation you wish to	o speak to the in:	spector about and why	they consider it be nec	essary to speak a	t the hearing -	

Representor ID and details: 4974/DP1 B.V. Thomas							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M □ 0 □	Additional SA SEA		Rep format: Eform	, ,		be consiered by 'writter sion of Public examination	•
2a - Do you consider the LDP is Sound? Sound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - No	does not not mee	et one or more test(s) of	soundness, plea	se indicate which test(s)	that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
		tiveness Tests - CE1 -	· No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Ame	nded Site: Other (see N	<u>lotes):</u>
	No	No	No	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende		the site as a Candidate st/west of St. Athan Roa		(If "Yes", plea	•	lidate Site Name and ref ference: 2446/CS1 and	,
 Please set out your representation below: Landscape impact -this is a greenfield site outside the from the south and from the Thaw Valley. Access issues - there are access issues, particularly if of the road are clearly too narrow to cope with more traffic Sewerage works - there is a lack of capacity at these values. Special Landscape Area - this site is part of a Special I arears. Impact on the general locality - more houses and more 	a secondary emergen works and currently the andscape Area - the cars will add yet more	cy access is required as ere are periodic smells w Council's own Policy Doo	Windmill Road is which will get wors cument - MD1 sta	e if more houses are buttes "new developments	Road is also too r uilt. should not have a	narrow and even if it is re	ealigned other sections on special landscape
lights on the junction of Eastgate/St. Athan Road, Cowbri	dge.		Ü			. , , ,	
More houses will ruin the character of Cowbridge as a	town.						
7. There is a right of way through the site which is very m	nuch valued by local pe	eaple of all ages. If the d	evelopment went	ahead this footpath cou	uld well be lost or	changed dramatically.	
3f - Please outline the changes you wish to see made to the D Keep this particular area as a Special Landscape Area ar	•	,					
This is a special greenfield site and the Cowbridge Bound	ary should remain in it	ts present [current] posit	tion.				
4b - If you wish to speak, please confirm which part of your rep	presentation you wish	to speak to the inspector	r about and why t	ney consider it be neces	ssary to speak at	the hearing -	

Representor ID and details: 4975/DP1 Virginia Board							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		Rep format: Eform		at a hearing session	e consiered by 'written re on of Public examination'	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound an P1 - Yes	nd does not not med P2 - Yes			e indicate which test(s) th	at it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 - Y	'es	
	Coherence and Effect	iveness Tests - CE	1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragra	ph Number:	Proposal Map:		Constraints Map	Appendices:
	MD12	9.15		MG9		Other - Not Listed . Feb 2012	Appendix 2 - Supplementary Planning Guidance
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes		If "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan		Amended Policy:	New Paragraph:			ded Site: Other (see Not	<u>es):</u>
	No	Yes	No	No	Yes	No	
	Notes:			F			
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name: Land Eas		e Site? Yes	(If "Yes", plea		ate Site Name and reference: MG9/ID22 Apper	
3e - Please set out your representation below: Test P1 Not prepared in accordance with Community Invo	olvemnt Scheme						
Test P2The sustainability appraisal is contradictory- the s	ite does not accord wit	h national Policy.					
Test C1 The Land Use Plan does not relate to any strate	gy.						
Test C2 Obviously unsuitable site in terms of facilities and	d access.						
Which Council Officer proposed it?							
3f - Please outline the changes you wish to see made to the D Remove Site MG9 from plan	eposit Plan to make it	sound (if relevant)					
Amend policy MD12 to support Gypsy and Traveller Com	munity						
All sites in the plan should be assessed on a similar basis	as affordable housing						
4b - If you wish to speak, please confirm which part of your rep	oresentation you wish t	o speak to the inspect	tor about and why t	they consider it be neces	ssary to speak at th	ne hearing -	

Representor ID and details: 4976/DP1 Joyce Dare							
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		Rep format: Eform			o be consiered by 'writte ssion of Public examinat	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	ne Plan is unsound ar P1 - Yes	nd does not not me P2 - Yes	et one or more test(s) o	f soundness, plea	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 -	Yes	
	Coherence and Effec	iveness Tests - CE		CE2 - Yes	CE3 - Yes	CE4 - Yes	
Ba - Which part of the Deposit Plan are you commenting on?	Policy Number:		ph Number:	Proposal Map:		Constraints Map	Appendices:
	MG9	6.49		MG9			
Bb - Do you wish to see any changes made to the Deposit Plar	as a result of your rep	resentation? Yes		If "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	ph: New Or Am	ended Site: Other (see	Notes):
	No	Yes	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende			te Site? Yes	(If "Yes", ple	0	didate Site Name and re	,
	Site Name: Land Ea	st of Llangan	X (/	Site R	eference: MG 9/ID 22 A	ppendix 1
3e - Please set out your representation below:							
Your proposal to locate this Gypsy traveller site in Llanga such sites as set out by the 2008 Fordham report which a the effect on the services and infrastructure of the curren dramatically and the transient nature of the a large propo	are listed in the LDP. Fit community and area l	roper and compreher has obviously not bee	sive consulation d n sufficiently consi	pes not appear to have dered. For example, the	been carried out local small villag	with the statutory, esser le school will see it's nur	itial and local bodies and nbers increase
At the same time, the proposed site would lie on a green double. It does not appear that the needs of the local polarmony, the needs of both sides must be considered at	pulation have been cor	sidered in any shape	or form. In order t	nat a community made			
I believe the Council should find a more suitable, sustains	able site which will mor	e adequately serve bo	oth the village of LI	angan and the Gypsy tra	aveller communit	у.	
3f - Please outline the changes you wish to see made to the D		,					
The proposed Gypsy travellor site at Llangan (Policy MGs appraisal that considers the real situation in the Plan area in preparing the LDP.	9) should be removed f a and meets the require	rom the LDP draft pla ments of the Gypsy o	n. The VOG should community as listed	d identify an alternate s I in the 2008 Fordham r	ite(s) that has be eport the recomn	en assessed according nendations of which app	to a relative sustainabili ear to have been ignored
4b - If you wish to speak, please confirm which part of your re	presentation you wish	o speak to the inspec	tor about and why	they consider it be nece	ssary to speak a	t the hearing -	

Representor ID and details: 4977/DP1 Andrew RT Davie	s AM						
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examinati	n representations' or do on? Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		I does not not mee P2 - Yes	et one or more test(s) of s	soundness, plea	se indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 -	Yes	
	Coherence and Effecti	veness Tests - CE1	- Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?		Amended Policy: No	New Paragraph:	Amended Paragraph	h: New Or Ame Yes	ended Site: Other (see I	
	Notes:		, v				
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name:	he site as a Candidate	Site? No	(If "Yes", pleas	-	didate Site Name and reference:	ference if known)
3e - Please set out your representation below: The proposed allocation at the site at Llangan does not meaning is greenfield land in accordance with the definition of brownian will not reduce the need to travel due to the limited local holds very limited access to public transport facilities; is not large enough to provide ancillary facilities required is located within a Special Landscape Area and in close does not meet the identified needs of Gypsies and Traverdoes not promote sustainable access to employment, she does not maximise opportunities for community developedoes not foster social inclusion due to the isolated location does not contribute to improvements in health due to ison	wnfield land set out in service provision in clo to support a sustainab proximity to a Conservellers, in the Vale of Glatopping, education, head ment and social welfare on of the site;	Figure 4.1 of PPW; se proximity to the site le development; ation area; amorgan alth, community, leisure;	3;	ies;			
3f - Please outline the changes you wish to see made to the D I hereby wish to see Llangan as the current proposed site		,					
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to	speak to the inspecto	or about and why the	hey consider it be neces	sary to speak at	the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4977/DP2 Andrew RT Davie	s AM						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		<u>Rep format:</u> Email		our comments to be con at a hearing session of		
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that th Procedural Tests -		does not not meet P2 - Unansv	` '	soundness, please indic	cate which test(s) th	at it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansv	wered C3 - Unans	wered C4 - Unans	wered	
	Coherence and Effecti	iveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswered	t i i i i i i i i i i i i i i i i i i i
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	<u>Number:</u>	Proposal Map:	Con	straints Map	Appendices:
	MG2(16)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Unansv	vered (If	"No" or "Unanswered'	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan	New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended S Unanswered	ite: Other (see Not Unanswered	<u>es):</u>
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	he site as a Candidate	Site? Unanswer	ed (If "Yes", plea	se give the Candidate S Site Reference		ence if known)
				<i>!</i>			

3e - Please set out your representation below:

Having given careful consideration to the proposed Draft Local Development Plan, and in this instance the proposal to include Lavernock as a Candidate Site for potential development, I hereby submit the following observations:

Road network/Site access:

The primary access route is the B4267 (or Lavernock Road). Anyone who uses this route is immediately aware of the extreme congestion that already exists during commuter hours – from 7am to around 9.30am, and then 3.00am to around 6.00pm. The only other access route to the proposed development site is a narrow country lane which appears insufficient to accommodate the projected flow of new traffic.

Returning to the B4267; it is essential that prior to considering approval of this site, a detailed analysis of traffic flows is conducted in the area. This would need too take into consideration the additional cars that would come through with the development of 450 new houses. The only roads in the area that provide access to Cardiff (through Dinas Powys and Penarth) are already at above capacity. Meanwhile, the Vale Council is unable to fund improvements to the highway network serving the area, and the Welsh Government has no plans to improve the Vale's network in the next decade.

As noted above, the Lavernock Road already experience issues relating to congestion and a large development of this nature would further increase demand on an already inadequate bus network that serves the route.

Severn Barrage:

Whilst the establishment of the Severn Barrage is yet to be confirmed, detailed Private Sector proposals have been drawn up and are in the public domain. As the only publicly owned land in the area, the Lavernock site would be a likely and (potentially) ideal landfall for the scheme. With a development of this scale a great deal of unrestricted space would be required for both road and rail network with connecting links to the Northern Vale. There is huge potential for the area in terms of jobs and investment at/near the Lavernock site, with the development stage expected to take over a decade.

Local Amenities:

The density of the proposed development (450 units) would make provision for additional amenities exceptionally difficult. The evidence provided to support the case that relevant core tests have been achieved for this site is insufficient. A detailed impact assessment of the proposed development on the provision of mains sewerage, for example, must be undertaken before approval is considered.

Impact on the ecological environment:

The Lavernock site is known to be rich in both fauna and wildlife and is an area of ecological importance. It is documented that Lavernock Point is a southerly migration point for a number of species of birdlife,

(ordered by Representation ID No.)

Representor ID and details: 4977/DP2 Andrew RT Davies AM

with the Severn Estuary coastline also considered a vital wildlife resource. I would strongly urge that a detailed assessment be undertaken to consider the impact of this potential development upon the wildlife in the area. Indeed, without such an ecological survey, this site should not be given any consideration for approval.

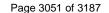
Further, it is noted that in November 2000, the Planning Inspector (in his report into objections received to the Draft Vale of Glamorgan Unitary Development Plan) called for the designation of a 'green belt' within the Vale of Glamorgan. Accepting the Vale council's view that prior to such a designation, there should be a "a sub-regional study conducted, to identify development needs and ways of managing change over the next 30 years within the region', I would urge that such a study be undertaken before green spaces such as Lavernock are considered for development.

In summary:

I believe that the proposed Candidate Site at Lavernock is deeply flawed. Not only would it lead to unsustainable demand on the road and public transport networks within the area, it is insufficiently well conceived to allow for adequate provision of amenities for a development of this scale. Aside from the fact that it would vastly transform the shape and scale of the village as it currently stands, it would place unmanageable pressure on the provision of essential public services in the area, and could have a devastating impact on an area of outstanding natural beauty and ecological significance. In each of these cases, I have expressed the view that the lack of sufficiently detailed impact assessments further undermines the case being made for the Candidate Site, and as such I would strongly urge rejection of this site accordingly.

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

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



(ordered by Representation ID No.)

Representor ID and details: 4977/DP3 Andrew RT Davie	es AM						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Eform	,	,	be consiered by 'written sion of Public examinati	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that th Procedural Tests - Consistency Tests -	P1 - No	P2 - No		of soundness, plea	se indicate which test(s) that it fails.
	Coherence and Effecti				CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG12(11)	<u>Paragra</u>	oh Number:	Proposal Map: MG2	7	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: No Notes:	Amended Policy: Yes	New Paragraph: No	Amended Paragra No	Aph: New Or Ame Yes	nded Site: Other (see I No	Notes):
3d - If your representation relates to a new, deleted or amende					· ·	lidate Site Name and re ference: (a)178/CS.1 (b	,
0. 51				7			

3e - Please set out your representation below:

Having given careful consideration to the proposed Draft Local Development Plan, and in this instance the proposal to include Cowbridge Cattle Market (MG 2(11)) as a Candidate Site for residential development, I hereby submit the following observations:

Firstly, whilst accepting that the Vale has had a target of 10,000 new houses imposed upon it, it should be noted that there has been little or no rationale provided by the Welsh Government to justify this figure. I would therefore urge the council (or the planning officer giving consideration to this proposal) to confirm whether it is their belief that this figure is justified, and indeed whether the demand does exist within the Vale for development on this scale.

The Cowbridge Cattle Market plays a key economic role in supporting the local farming community. The market, which sells on average over 500 head of sheep each week, trades successfully and forms an integral focus point in the centre of Cowbridge which remains an attractive and traditional market town.

The site also performs a vital economic function to the wider business community, offering car and coach parking for up to 200 cars on the days on which the market itself is not open. The Cattle Market site serves visitors and shoppers coming to the area, whilst also providing invaluable spaces for the staff who work at numerous retail outlets and businesses in the town.

It has been noted by local businesses that the existing parking provision is already, at times, insufficient to sustain demand for services in Cowbridge. Given that the proposals contained within the Draft LDP allow only for 25 spaces in a small site adjacent to the town wall, the removal of around 200 spaces would have a hugely detrimental impact upon the viability of the town centre. The impact of this would be heightened by the existence of several large-scale out of town retail centres; from McArthur Glen to Cardiff Gate and Culverhouse Cross. The availability of free and abundant parking at these sites already places great pressure on the local Cowbridge economy.

As such, I would strongly urge that a detailed assessment be undertaken to evaluate the impact of residential development, alongside the withdrawal of the majority of public parking provision, on the local economy – this should consider both the added congestion that new houses would bring, and the impact upon local businesses if such a significant site were to be withdrawn.

Policies MG 12(11) and MG 15 refer to a proposed site for the redevelopment of the replacement cattle market. Residents have raised objections that this is a green field site and I would urge planners to consider brown field sites ahead of sites of this nature. Equally significant, however, is the fact that within the Vale LDP no proposals are made for the purchase of the site, or indeed its development as a market.

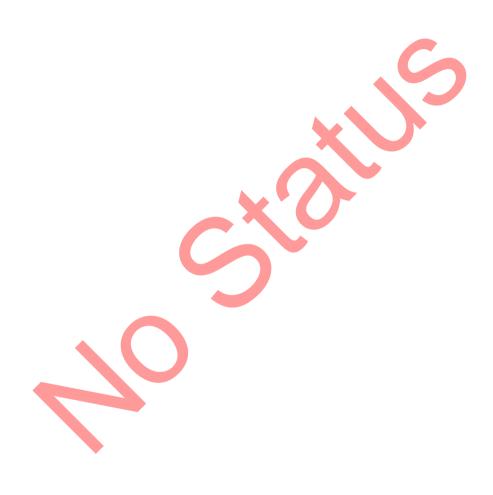
3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

I would urge the inclusion of an additional policy to uphold the continuation of the market at its present site. This should be accompanied by plans to improve and develop the parking facilities currently on offer, supporting the local economy and ensuring the continued attractiveness of Cowbridge as a tourist destination and as a prosperous trading market town.

Representation ID No.)

Representor ID and details: 4977/DP3 Andrew RT Davies AM

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



(ordered by Representation ID No.)

Representor ID and details: 4977/DP4 Andrew RT Davie	s AM						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: Eform 4a - do you want your comments to be consiered by 'written repression of Public examination?'					•	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		and does not not me	et one or more test(s) of	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	- No	
	Coherence and Effect	tiveness Tests - C	E1 - No	CE2 - Yes	CE3 - Yes	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Parag</u> i	raph Number:	Proposal Map:		Constraints Map	Appendices:
	MG15			MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy:	Amended Policy: Yes	New Paragraph: No	Amended Paragra No	aph: <u>New Or Am</u> Yes	ended Site: Other (see No	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	•			(If "Yes", ple of Marley Tile Site, St	Ū	didate Site Name and re eference: (a) 178/CS.1 (,

3e - Please set out your representation below:

Having given careful consideration to the proposed Draft Local Development Plan, and in this instance the proposal to include Cowbridge Cattle Market (MG 2(11)) as a Candidate Site for residential development, I hereby submit the following observations:

Firstly, whilst accepting that the Vale has had a target of 10,000 new houses imposed upon it, it should be noted that there has been little or no rationale provided by the Welsh Government to justify this figure. I would therefore urge the council (or the planning officer giving consideration to this proposal) to confirm whether it is their belief that this figure is justified, and indeed whether the demand does exist within the Vale for development on this scale.

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The site also performs a vital economic function to the wider business community, offering car and coach parking for up to 200 cars on the days on which the market itself is not open. The Cattle Market site serves visitors and shoppers coming to the area, whilst also providing invaluable spaces for the staff who work at numerous retail outlets and businesses in the town.

It has been noted by local businesses that the existing parking provision is already, at times, insufficient to sustain demand for services in Cowbridge. Given that the proposals contained within the Draft LDP allow only for 25 spaces in a small site adjacent to the town wall, the removal of around 200 spaces would have a hugely detrimental impact upon the viability of the town centre. The impact of this would be heightened by the existence of several large-scale out of town retail centres; from McArthur Glen to Cardiff Gate and Culverhouse Cross. The availability of free and abundant parking at these sites already places great pressure on the local Cowbridge economy.

As such, I would strongly urge that a detailed assessment be undertaken to evaluate the impact of residential development, alongside the withdrawal of the majority of public parking provision, on the local economy – this should consider both the added congestion that new houses would bring, and the impact upon local businesses if such a significant site were to be withdrawn.

Policies MG 12(11) and MG 15 refer to a proposed site for the redevelopment of the replacement cattle market. Residents have raised objections that this is a green field site and I would urge planners to consider brown field sites ahead of sites of this nature. Equally significant, however, is the fact that within the Vale LDP no proposals are made for the purchase of the site, or indeed its development as a market.

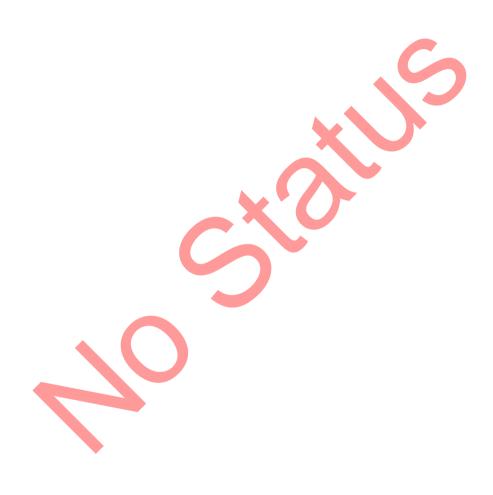
3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

I would urge the inclusion of an additional policy to uphold the continuation of the market at its present site. This should be accompanied by plans to improve and develop the parking facilities currently on offer, supporting the local economy and ensuring the continued attractiveness of Cowbridge as a tourist destination and as a prosperous trading market town

Representation ID No.)

Representor ID and details: 4977/DP4 Andrew RT Davies AM

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



(ordered by Representation ID No.)

Representor ID and details: 4977/DP5 Andrew RT Davie	s AM									
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Email	,	comments to be consie a hearing session of Pul	ered by 'written representations' or do blic examination?				
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered									
	Consistency Tests -	C1 - Unanswered	C2 - Unanswe	red C3 - Unanswe	red C4 - Unanswe	red				
	Coherence and Effecti	veness Tests - CE1 -	Unanswered CE	E2 - Unanswered C	E3 - Unanswered C	E4 - Unanswered				
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number: Pr	oposal Map:	Constra	aints Map Appendices:				
						• • • •				
3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)										
3c - What changes would like to see made to the Deposit Plan'	? New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragraph: Unanswered	New Or Amended Site: Unanswered	Other (see Notes): Unanswered				
	Notes:									
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name:	ne site as a Candidate S	Site? Unanswered	(If "Yes", please	give the Candidate Site Site Reference:	Name and reference if known)				

3e - Please set out your representation below:

Having given careful consideration to the proposed Draft Local Development Plan, and in this instance the proposal to include Site 26 (Wenvoe) as a Candidate Site for potential development, I hereby submit the following observations:

Traffic Issues:

The proposed entrance to the development via the bottom of Walston Road and Clos Llanfair is insufficient to allow for the introduction of extra cars on this scale. Not only is the width of this residential street inadequate to support such an increase in the scale of traffic, the circulation issues that already exist throughout the day on Port Road (which I cover below) would be substantially worsened.

Returning to Clos Llanfair, which was built to accommodate vehicles from just 18 houses, the shape and scale of this cul-de-sac (with short sight distances and sharp turns) are wholly inappropriate to facilitate the extra demand that would accompany the introduction of 150 new houses.

In terms of Port Road, which acts as an arterial through-point for residents of Wenvoe as well as commuters passing through, there are already substantial issues with the flow of traffic at peak times; an issue which already places substantial pressure on the village itself as vehicles attempt to circumnavigate hold-ups by passing through the village itself via the Old Port Road This problem would be exacerbated by the introduction of a development of this scale, with both residents and visitors contributing to traffic on a road which already suffers from 'bottle-necking'.

In light of these issues, it is essential that prior to considering approval of this site a detailed analysis of traffic flows is conducted in the area. This would need to take into consideration the additional cars that would come with the development of 150 new houses.

Lack of facilities to support development on this scale:

Contained within the Deposit Plan Written Statement is the assertion that Wenvoe village is "considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact upon the existing character and local environment". It further notes that "additional development will not only help to sustain existing services and facilities but will also provide opportunities for further enhancement".

Having met with local residents, and having visited the village myself on a number of occasions, it is hard to reconcile this statement with pre-existing knowledge of the local area. In fact, as a village of just 500 houses, the services and facilities in Wenvoe are already overstretched It has a small village shop, with parking provision for 3 vehicles at once, an over-subscribed primary school, a pub and a hotel Wenvoe is already a 'commuter hub', given that there are very few job opportunities in the village, and residents are reliant almost entirely upon vehicles given the irregularity of the bus service that operates, and the fact that there is no local train station. I note, at this juncture, that one of the key sustainability objectives of the LDP is that the Vale should not "act merely as a commuter belt for Cardiff.

(ordered by Representation ID No.)

Representor ID and details: 4977/DP5 Andrew RT Davies AM

It is difficult to envisage the introduction of 150 new houses aiding the sustainability of the services currently on offer and the evidence supporting such a claim is scarce

Environmental Issues:

The LDP states clearly that priority should be given to brown-field sites for development, and yet approval of Site 26 will in effect be an irreversible development on open countryside. There are strongly held concerns amongst local residents that insufficient consideration has been given to existing brown-field sites in the Vale, before considering areas such as this.

Further, it is noted that in November 2000, the Planning Inspector (in his report into objections received to the Draft Vale of Glamorgan Unitary Development Plan) suggested the designation of a 'green-belt' within the Vale of Glamorgan. Accepting the Vale council's view that prior to such a designation, there should be a "sub-regional study conducted, to identify development needs and ways of managing change over the next 30 years within the region", I would urge that such a study be undertaken before green spaces such as Site 26 are considered for development.

Finally, the Sustainability Appraisal Report states that the Candidate Site is "not within an area prone to flooding", and indeed it is true that Wenvoe is not currently deemed to be an area at risk of flooding, it should be recorded that the fields earmarked for development are on a steep slope to the West of the village. Whilst water currently drains into the stream, the land is known to become extremely boggy after prolonged rainfall and an impact assessment into the potential for flooding post-development should be undertaken before approval is considered.

In summary, I have strong reservations about the inclusion of Site 26 within the local Development Plan, based not only upon representations made to me by local constituents, but also upon my knowledge of the local community I have strong concerns, which I have detailed above, that a development of this scale could lead to unsustainable demand upon the road and public transport networks within the area, and indeed that, rather than helping to sustain existing facilities and services, this development (particularly when considered alongside the development of 220 on the ITV Wales site) could place an unsustainable demand on already scarce resources.

The impact upon Clos Llanfair and the bottom of Walston Road, of becoming an access point for the new development is also of serious concern and I would urge consideration to be given to looking at alternatives if the development is considered for approval.

Notwithstanding the objections raised by residents that a development of this scale would be incongruous with the shape and scale of the village, there are also valid concerns on environmental and ecological grounds Given that priority is said to be given to developing on existing brown-field sites, I would urge that consideration be given to these prior to green spaces such as these. Further, I have suggested that the Vale council should first conduct a study into the need or feasibility of establishing a protective 'green-belt' in the Vale As such, I would strongly urge rejection of this site for inclusion within the LDP.

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

(ordered by Representation ID No.)

Representor ID and details: 4978/DP1 Michael Carney							
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			to be consiered by 'writter ssion of Public examination	
•	2b - If you think that the Procedural Tests -	P1 - No	P2 - No	` '		ase indicate which test(s)	that it fails.
	Consistency Tests - Coherence and Effecti			C3 - No CE2 - Yes	CE3 - No	- No CE4 - No	
, , ,	Policy Number: MG2(13)	<u>Paragr</u> 	aph Number:	Proposal Map: MG2)	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: No Notes:	Amended Policy: No	New Paragraph: No	Amended Paragra No	ph: New Or Am Yes	ended Site: Other (see No	Notes):
3d - If your representation relates to a new, deleted or amende	d site, did you submit t Site Name: land to ea			(If "Yes", ple	ū	ndidate Site Name and ref	,
3e - Please set out your representation below:				,			

Site MG2 (13)

Please see attached document . site MG2 mac response

- 1.I do not believe that 7500 houses are required in the Vale of Glamorgan over the next 15 years. The additional houses will only be required if the number of jobs in the Vale is increased and I have seen no evidence over the last 15 years to support this premise. Alternatively the Vale is being used as providing additional housing for other employment areas such as Cardiff but surely this is not sustainable and is not environmentally sound. Has a sustainability assessment been carried out using the regions in South Wales as opposed to the individual locations within the region? The Vale already has the highest percentage in Wales commuting out of the region for employment and Cowbridge has over 75% of the working population working outside of Cowbridge.
- 2. Within the Deposit Draft LDP supporting document Designation of Special Landscape Areas (2008), the site allocated as MG2 (13) is clearly shown as forming an integral part of the Lower Thaw Special Landscape Area (SLA 2 – Upper and Lower Thaw Valley). Para 5.3.11 of Planning Policy Wales (Edition 4, February 2011) (PPW) states that 'non statutory designations such as Special Landscape Areas or Sites of Importance for Nature Conservation should be solidly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site.' This is what has occurred with the SLA designation report, incorporating the use of LANDMAP assessment methodology and a methodology for the designation of SLAs agreed with other South East Wales Local Planning Authorities. In forming the current LDP proposals map, the SLA boundary has been removed where it has been transposed, without explanation of why this has been done. Even if settlement boundaries can be redrawn as part of development plans surely SLAs cannot. Within the 2008 SLA supporting document the description of the Lower Thaw Valley highlights its 'dramatic valley form' and says it is a 'relatively uncommon' landscape. This document also points out that the landscape character is already being eroded by suburban development. The location of site MG2 (13) extending southwards over the ridgeline and into the steep sided narrow valley will clearly only exacerbate this situation further. Para 3.2.2 of PPW states that Local Planning Authorities should consider the effect of development upon the conservation of landscape. Development of this site would clearly not achieve this. PPW further sets out in para 4.1.7 the five main themes of the Welsh Government's Environment Strategy and Action Plan, one of which is to ensure distinctive biodiversity, landscapes and seascapes. Development of this site would clearly have a negative impact upon a relatively uncommon landscape which would be contrary to themes of the Environment Strategy, Para 4.4.2 of PPW also states that planning policies and proposals should promote the 'conservation of biodiversity, habitats and landscapes' – again something which will not be achieved through the allocation of site MG2 (13) for development. Para 4.5.4 of PPW goes on to state: The countryside is a dynamic and multipurpose resource. In line with sustainability principles, it must be conserved and, where possible, enhanced for the sake of its ecological, physiographical, historical, archaeological and agricultural value and for its landscape and natural resources, balancing the need to conserve these attributes against the economic, social and recreational needs of local communities and visitors.' The Council's own supporting document states the features of the Lower Thaw valley are relatively uncommon and are already being eroded by suburban development around Cowbridge. These are not replaceable or frequently occurring features and as such it would be unsustainable to develop the site. The site has a footpath through it and forms part of several walks in the rural Vale. (fig 1 below) Hence it is a valuable amenity to the community which would be lost and should be preserved. The council may state that the sustainability assessment balances this destruction against the economic and social needs of the community but I believe the councils sustainability assessment to be very subjective and flawed leading to an overinflated score.

(ordered by Representation ID No.)

Representor ID and details: 4978/DP1 Michael Carney

- 3. The site is too far from the town centre and will require the residents to drive into Cowbridge which already has significant parking issues.
- 4. The site will have access issues onto a busy road where the gradient of the main road will be very steep after it is straightened.
- 5. The site has been given a high score for amenities. All of the primary and secondary schools are full and oversubscribed. The sewage works is at capacity.
- 6.The site has been given a high score for transportation. As mentioned earlier most residents will drive into Cowbridge. There are few employment opportunities in Cowbridge and people will have to travel outside Cowbridge for employment with public transportation links are very poor and under proposed changes to funding likely to get worse.
- 7.Cowbridge is already a sustainable community and does not require additional housing to improve this. In fact increasing the number of houses will negatively impact on the character of the town and the already severely strained amenities.
- 8.The site contains an extensive biodiversity with many creatures using and nesting in the field and hedgerows including slow worms and bats
- 9.Development of this site is also against the LDP's own aims and objectives 'Objective 4 To protect and enhance the Vale of Glamorgan's historic, built and natural environment. 4.8. The historic, built and natural environment of the Vale of Glamorgan is highly valued by residents and visitors and includes European, national and local designations which provide local identify and distinctiveness and present opportunities for recreation and tourism. The LDP will ensure that these natural and built environment assets are protected, conserved and where appropriate enhanced as an important resource for local people and which attract visitors and contributes to the local economy.' Allocation of site MG2 (13) clearly does not meet this objective. No justification is given for the exclusion of the site from the SLA boundary. The topography of the site clearly relates to the narrow Lower Thaw valley and extends the sprawl of Cowbridge in this southerly direction, exacerbating the already recognised problem of suburban development impacting negatively upon a relatively uncommon landscape.

(Picture of winter scene not copied)

Fig 1. Winter view of the site with walkers, looking to the south west

M A Carney. 30/03/2012

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

I would like the candidate site removed. A green belt or wedge should be introduced and the SSA status reinstated.

Development could be transferred to an alternative site such as Heol- y- Felin MG2(15) or a new settlement on a brownfield site such as Llandow Estate

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - To express the opinions and local aspect s of the proposalsand to challenge the sustainability assessment

	'i gair	_	n Loodi Beve		<i>DEI</i> 0011 1	LAN (I COIGA	1 y 2012) IXEI	REGENTA	HON DETAILO.	Representation ID No.
Representor ID and o	details:	4979/DI	P1 Helen & Peter Wh	nite						
Date Lodged Status 31/03/2012 M	Petitio	n and No. 0	Supporting Evidence	Additional SA SEA		Rep format: Eform	,	,	to be consiered by 'writte ssion of Public examinati	
a - Do you consider t	he LDP i	s Sound?	Unsound	2b - If you think that the	ne Plan is unsound a	and does not not mee	et one or more test(s)	of soundness, ple	ase indicate which test(s) that it fails.
				Procedural Tests -	P1 - No	P2 - No				
				Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
				Coherence and Effect	iveness Tests - C	E1 - No	CE2 - Yes	CE3 - No	CE4 - No	
Ba - Which part of the	Deposit	Plan are yo	ou commenting on?	Policy Number:	<u>Parag</u> ı	raph Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to se	e any ch	anges mad	de to the Deposit Plan	as a result of your rep	resentation? Yes	(f "No" or "Unanswer	ed" - go to 3d)		
sc - What changes wo	ould like t	o see mad	e to the Deposit Plan?	New Policy:	Amended Policy:	New Paragraph:	Amended Parag	raph: New Or Am	ended Site: Other (see	Notes):
				Yes	No	No	No	No	Yes	
				Notes:						
3d - If your represent	ation rela	ites to a ne	w, deleted or amende	d site, did you submit t Site Name:	the site as a Candid	ate Site?	(If "Yes", pl	ū	ndidate Site Name and re reference:	ference if known)
3e - Please set out yo We are objecting				s to build 340 houses o	on the St Cyres Scho	ool site and at the en	d of Windyridge.			
Road. During ru	sh hours	Cardiff Ro	ad is just one long tra		nyturnpike. You are	e proposing to buildin	g another 340 houses		ing rush hours with peop e will mean approximatel	

One of the access routes is not only congested with traffic trying to leave or enter the Murch but added to the infants school traffic its bedlam. Add that to the additional traffic which will be created by building these houses then we believe its not only going to be time consuming for us commuters but also a recipe for disaster. It's only a matter of time before there will be an accident. The other access route is over an old bridge which does not even allow two cars to pass. Not to mention Cardiff Road. This road has been closed on a couple of occasions just over the last couple of months due to accidents. It's a permanent traffic jam in and out of Dinas Powys.

The proposal to open Windyridge as a through road is just ludicrous. You can barely get up and down the road now with all of the parked cars on the road as there isn't enough drive space with the houses (each house owning between 2 and 4 cars). We bought our house due to it's guiet location and now you are proposing to take the enjoyment of our home away from us by allowing cars to use the road as access to additional housing on green field land. Even if you do change Windyridge into an access road this will not make any difference to the congestion problems which WILL be incurred by building these houses!

The traffic congestion on Cardiff Road will not only be made worse by the extra traffic from Dinas Powys but by people trying to leave the Penarth St Cyres site which the extra cars going to and from the school due to the Dinas Powys School children being moved to the Penarth site.

The LDP proposals will have a detrimental effect on our community!!! We didn't only buy our house in Windyridge for the peace and guiet of the area but also because of the countryside surrounding the area. Now you propose to add a huge housing estate which will not only spoil the countryside, our enjoyment of our home and surrounding area but also cause the residents in the area a living hell if they want to use their cars. Not to mention the air pollution caused not only by the extra cars in the area but by the constant traffic congestion which will be added to in this area.

If you would like some evidence in respect of the traffic congestion and/or the parking issues in both Windyridge and Murch Road running up to Windyridge then please let me know.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - 1. Scrap all plans to build all houses on the St Cyres Site in Dinas Powys.

(ordered by Representation ID No.)

Representor ID and details: 4979/DP1 Helen & Peter White

Consider utilising the site as either a school (ie: putting the Junior and Infants school together), a doctors surgery (because where the doctors is situated at the moment you cannot park) or much needed playing fields. Anything that does not involve further building on this green field site) as the site is situated close to the highest population density in the Vale of Glamorgan and so is therefore, ideal for community facilities.

- 2. Scrap the building of the houses at Caerleon Road for all of the above reasons.
- 3. If you want to build something building a Dinas Powys bypass.
- 4. The Counsel should stop seeing pound signs and see commons sense.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing Your proposals have distressed my family due to the detrimental effect it will have on all of us. Due to this, all of my representations are relevant when speaking to the Inspector.

Representor ID and details: 4980/DP1 Dr Simon Richard	S		
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0	Additional SA SEA		comments to be consiered by 'written representations' or do hearing session of Public examination? Written
•	2b - If you think that the Plan is unsound and de Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of sou P2 - Unanswered	ndness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswere	ed C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - L	Jnanswered CE2 - Yes CE	3 - Yes CE4 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
		MG2	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go	o to 3d)
3c - What changes would like to see made to the Deposit Plan?			New Or Amended Site: Other (see Notes): Yes Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate S Site Name: Land to the west of St Athan Road		ive the Candidate Site Name and reference if known) Site Reference: 2446/CS1 and 2446/CS2
3e - Please set out your representation below:			
 Landscape impact - This is a "greenfield" site located or approach Cowbridge from the South, from around Cowbrid 		ent of 100 houses will not fir in with the lands	scape and will be clearly seen from St Athan Road as you
Access issues - There are access issues, in particular in of the road are clearly too narrow to cope with more traffic children walking to school. The traffic lights in Cowbridge at	including just slightly further up the hill by St Ma	ary Church. The additional traffic that it wil b	
3. Sewerage works - there is a lack of capacity at these we	orks and currently there are periodic smells, evi	dent from our garden, which will only get wo	rse if more houses are built.
 Special Landscape Area - this site is part of a Special L areas." 	andscape Area which in the Councils own word	s in policy MD1, "new development should i	not have an unacceptable impact on special landscape
5. Impact on Cowbridge - more houses means more cars	which will add more pressure on local services	including healthcare provision, schools and	parking.
6. Public Right of Way Footpath - this footpath is used and	valued by many people of all ages. If building	went ahead the character of this public footp	eath would undoubtedly change.
3f - Please outline the changes you wish to see made to the De			
Have the candidate site remoeved and included as a gree	n wedge to prevent further development conside	erations.	
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector a	about and why they consider it be necessary	to speak at the hearing -

Representor ID and details: 4981/DP1 Jean Roderick							
<u>Date Lodged</u> <u>Status</u> <u>Petition and No.</u> <u>Supporting Evidence</u>	Additional SA SEA		Rep format:	, ,		be consiered by 'writter	•
31/03/2012 M			Eform	you want to speak	at a hearing sess	ion of Public examination	on? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that th	ne Plan is unsound and	does not not mee	et one or more test(s) of	soundness, pleas	se indicate which test(s)	that it fails.
	Procedural Tests -	P1 - No	P2 - Yes				
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4 -	No	
	Coherence and Effecti	iveness Tests - CE1	- No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrapl</u>	n Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Amer	nded Site: Other (see N	Notes):
	No	Yes	No	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site did vou submit t	he site as a Candidate	Site? No.	(If "Yes" nlea	ase give the Candi	date Site Name and ref	erence if known)
a in your representation relates to a new, asisting or amonate	Site Name:	ino ono do di Garrarda.		(11 100 , pioc	Site Ref		oronios ii knowny
3e - Please set out your representation below:							
As a resident and former road safety campaigner for man hundreds of houses on the former St Cyres School site, or that sufficient open space too has been allocated. However already overburdened will be immense and the bottlenecket to the capital and badly needs a bypass for the rising through the company of the capital and badly needs a bypass for the rising through the capital and badly needs a bypass for the rising throu	off Caerleon Road and the er I wish to see more also and queues which also and queues which also which also which w	he furthe <mark>r residential e</mark> bout the "robust Transp	xtension to Barry \ oort Assessment"	Waterfront and beyond. which will be required.	The Vale does not the impact on the	eed more housing and I e already packed local h	welcome that and hope highway network which is
3f - Please outline the changes you wish to see made to the D							
There must be detailed studies, plans and proposals for the Waterfront to Cardiff Bay By Pass been totally abandoned		in improved road and ti	ansport infrastruc	ture for the proposed si	tes before the hou	ise building begins. Ha	s the proposed Barry
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to	speak to the inspecto	r about and why t	hey consider it be neces	ssary to speak at t	the hearing -	

Represer	ntor I	D and	details	: 4982/[DP1 DB Webb								
Date Lodg 31/03/20		Status M	Peti	tion and No 0	Supporting Evidence	Additional SA SEA			Rep format: Eform			to be consiered by 'writte ession of Public examinati	
2a - Do yo	ou cc	nsider	the LDI	P is Sound?	Unsound	2b - If you think that the Procedural Tests -	he Plan is uns P1 - No	sound and	does not not me P2 - No	et one or more test(s)	of soundness, ple	ease indicate which test(s) that it fails.
						Consistency Tests -	C1 - No		C2 - No	C3 - No	C4	- Yes	
						Coherence and Effect	tiveness Tests	s - CE1 -	Yes	CE2 - Yes	CE3 - No	CE4 - Yes	
3a - Whic	h pa	t of the	Depos	it Plan are	you commenting on?	Policy Number:		Paragraph	Number:	Proposal Map:		Constraints Map	Appendices:
						MG2(11)							
3b - Do yo	ou wi	sh to s	ee any	changes ma	ade to the Deposit Plar	as a result of your rep	resentation?	Yes		(If "No" or "Unanswere	ed" - go to 3d)		
3c - What	cha	nges w	ould like	e to see ma	de to the Deposit Plan	? New Policy:	Amended F	Policy:	New Paragraph	Amended Paragr	aph: New Or Am	nended Site: Other (see	Notes):
						No	Yes		No	No	No	No	
						Notes:							
3d - If yo	ur re	presen	ation re	elates to a r	new, deleted or amende	ed site, did you submit Site Name:	the site as a (Candidate	Site? No	(If "Yes", pl	Ū	ndidate Site Name and re Reference:	ference if known)
3e - Plea	se s	et out y	our rep	resentation	below:								
by c is a ever adec park	ar. T deve nts, (quate ting a	he attra loping food fa e parkin round	action o tourist of r, musi g and t the tow	f the town we centre with loc festival, factor had need had as all area	which fuels a perceived the avy local investment ashion festival, book faits been well audited and as to the East especial	need for increased hor in amenties (Physic G r, concerts, plays and d communicated to the	using depends arden, Old Ha operatic produ planning offic rk fill up early	s on adequall), increaductions aparting the Control of the Control	uate parking and ased retailing Wa art from WI outle cowbridge and L	to remove that will ma aitrose, WH Smiths etc ts and a farmers' mark anblethian Residents (tke the town less and the steadily increased	ort from neighbouring villattractive and reduce housing retail and food outlets on and on. None of these a cattle market parking ar John Ltd the situation wo	using demand. The town s and a large number of can function without
				ges you wis ket parking		eposit Plan to make it	sound (if relev	vant)					
4b - If yo	u wis	sh to sp	eak, ple	ease confirr	n which part of your re	presentation you wish t	o speak to the	e inspecto	about and why	they consider it be nec	essary to speak a	at the hearing -	

Representor ID and details: 4982/DP2 DB Webb							
Date LodgedStatusPetition and No.Supporting Evidence31/03/2012M0	Additional SA SEA		Rep format: Eform	,	,	consiered by 'written n of Public examinati	n representations' or do on? Unanswered
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - Yes	does not not mee	t one or more test(s) o	f soundness, please	indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Yes	C4 - Ye	es	
	Coherence and Effect	tiveness Tests - CE1	- Yes	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(13)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	presentation? Yes	(If	"No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	ph: New Or Amende	ed Site: Other (see I	<u> </u>
	No	Yes	No	No	No	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name:	the site as a Candidate	Site? No	(If "Yes", plea	ase give the Candida Site Refer	ate Site Name and re ence:	ference if known)
3e - Please set out your representation below: This is an area of beatiful scenery running down to the Ri	ver Thaw , policy is to	protect such areas not	to build on them	/			
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	oresentation you wish t	o speak to the inspecto	or about and why th	ney consider it be nece	ssary to speak at the	hearing -	

Representor ID and details: 4983/DP1 Glen & Emma Mo	onteiro						
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0	Additional SA SEA		Rep format: Eform	, ,	our comments to be con at a hearing session of	•	•
2a - Do you consider the LDP is Sound? Unsound	-	e Plan is unsound and o P1 - No	does not not mee P2 - No	t one or more test(s) of	soundness, please indi	cate which test(s)	that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 - No		
	Coherence and Effective	veness Tests - CE1 -	No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:	Cor	nstraints Map	Appendices:
				MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	P New Policy: Yes		New Paragraph: No	Amended Paragrap No	h: New Or Amended S	Site: Other (see No	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	ne site as a Candidate S	Site?	(If "Yes", plea	ase give the Candidate S Site Reference		erence if known)
3e - Please set out your representation below: Dinas Powys - Windyridge. Windyridge road unsuitable for Currently a cul-de-sac with limited traffic making it a safet		ue to the narrowness. F	Parking a probler	n with vehicles currently	y having to be parked or	າ pavements. Pollເ	ution and noise.
3f - Please outline the changes you wish to see made to the D Infrastructure dramatically improved to take flow of peak-facilities. Medical services restricted due to the limitations	ime traffic. Residents tr	apped with only two acc					ghts. Better community
4h - If you wish to speak please confirm which part of your rel	presentation you wish to	eneak to the inenector	about and why th	ney consider it he neces	esary to speak at the he		

Representor ID and details: 4984/DP1 Marilyn Desrosier	S						
Date LodgedStatusPetition and No.Supporting Evidence31/03/2012M0	Additional SA SEA		Rep format: Eform	,	,	to be consiered by 'writte ssion of Public examinati	n representations' or do on? Do not speak at he
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - No	does not not me P2 - No	et one or more test(s) o	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	- No	
	Coherence and Effect	iveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? No	((If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	Policy:	Amended Policy: No	New Paragraph: No	Amended Paragra No	<u>New Or Am</u> No	ended Site: Other (see No	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site? No	(If "Yes", ple	J	ndidate Site Name and re deference:	ference if known)
3e - Please set out your representation below:							
My comments are specific to Site Reference 2407/CS Bry a sensible decision given the effect any additional development would be immediately felt. The roalong with proposed development at White Farm would he Cardiff. I have additional concerns that any change to the	oment would have on the bad infrastructure along ave a catastrophic effec	ne surrou <mark>nd</mark> ing area, bo Port Road could not so ct on the environment,	oth from the envoustain the increase of just locally, but	romental effect and los se in traffic, particularly ut right across the Vale	s of green recrea if the 500 + hous communities whi	itional land. The effect of sing development at Wey ich use the Port Road as	building an additional cock takes place, This
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it	sound (if relevant)					
4b If you wish to speak please confirm which part of your rar	procontation you wish to	o speak to the inspecto	r about and why t	thay cancidar it ha nace	econy to chook o	at the hearing	

Representor ID and details: 4985/DP1 Caroline Desrosie	ers						
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			be consiered by 'writter sion of Public examinati	n representations' or do on? Do not speak at he
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - No	does not not mee P2 - No	et one or more test(s) of	of soundness, plea	se indicate which test(s) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effecti	iveness Tests - CE1	· No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? No	(If "No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? <u>New Policy:</u> No		New Paragraph: No	Amended Paragra No	aph: New Or Ame	nded Site: Other (see I	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	he site as a Candidate	Site? No	(If "Yes", ple	· ·	lidate Site Name and ref	ference if known)
3e - Please set out your representation below:				,			
My comments are specific to Site Reference 2407/CS Bry a sensible decision given the effect any additional develop 180 house development would be immediately felt. The re along with proposed development at White Farm would h Cardiff. I have additional concerns that any change to the	pment would have on the bad infrastructure along ave a catastrophic effec	ne surrou <mark>nd</mark> ing area, bo Port Road could not su ct on the environment, i	th from the envorustain the increas not just locally, bu	romental effect and los se in traffic, particularly ut right across the Vale	ss of green recreati if the 500 + housir communities whice	onal land. The effect of ng development at Weyo th use the Port Road as	building an additional cock takes place, This
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it s	sound (if relevant)					
4h - If you wish to speak, please confirm which part of your re	presentation you wish to	n speak to the inspecto	r about and why t	hev consider it he nec	essary to speak at	the hearing -	

Representor ID and details: 4986/DP1 Sam Tanguay							•
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M 0	Additional SA SEA		Rep format: Eform			be consiered by 'written sion of Public examination	
•	2b - If you think that the Procedural Tests -	he Plan is unsound ar P1 - No	P2 - No	• • •	•	se indicate which test(s)	that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	No	
	Coherence and Effect	tiveness Tests - CE	1 - No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragra</u>	ph Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	oresentation? Yes	(1	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	·	Amended Policy:	New Paragraph:		h: New Or Ame	nded Site: Other (see No	
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit Site Name: land to w			(If "Yes", pleas	· ·	idate Site Name and refe ference: 2446/cs.1 and 2	,
I am concerned both about the number of houses and loc loss of amenity and also concerned on a wider level about 1)The loss of wild life corridor/ habitat if this area is develoned 2) damage to the landscape ,by changing the nature of the susequent effects this will have on bio diversity 3) loss of amenity in respect of the public footpath which which which which which impact this level of development would have on surface 5)Unaceptable safety risks associated with the impact of intraffic) if access is granted via windmill lane 6)the pressure on local infrastructure such as sewerage and cowbridge such as the old school site. 7) over development of cowbridge would damage its specification the rural feel of the area and a clear development but it is my opinion that the impact of a housing development unsustainable.	pped would no longer have to a water drainage and some and the local schools from the loca	eve a special landsca he same appeal if it w ubsequent flooding ris al pets and children(e om the number of add	pe area and green f as through a housin sks from loss of drai e.g My kitten was kr itional houses proper et on local commerce	field site ,in terms of visuing estate. Inage area on the adjace nocked down and killed coosed particularly if conside. New housing should be	ent watercourse - on broadway last dered alongside	e nature of the use of the River Thaw. week, not far from winds other developments allre	e land , noise levels and mill lane with existing ady planned within
3f - Please outline the changes you wish to see made to the De Have candidate site removed and have the site designant	•	,	a green wedge in o	rder to preserve its lands	scape value and	to p[revent further develo	opments.

Representation ID No.)

Representor ID and details: 4986/DP1 Sam Tanguay

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



Representor	ID and d	letails:	4987/D	P1 Stuart Ornek								
Date Lodged 31/03/2012	Status M	Petitio	on and No. 0	Supporting Evidence	Additional SA SEA			Rep format: Eform			to be consiered by 'writte ession of Public examinati	n representations' or do ion? Do not speak at he
2a - Do you co	onsider th	he LDP	is Sound?	Sound	2b - If you think that the Procedural Tests -	ne Plan is unsc P1 - No	ound and	does not not m P2 - No	eet one or more test(s) of soundness, ple	ease indicate which test(s	s) that it fails.
					Consistency Tests -	C1 - No		C2 - No	C3 - No	C4	- No	
					Coherence and Effect	iveness Tests	- CE1 -	No	CE2 - No	CE3 - No	CE4 - No	
3a - Which pa	rt of the I	Deposit	Plan are y	ou commenting on?	Policy Number:	<u> </u>	Paragraph	Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you w	ish to see	e any cl	hanges ma	de to the Deposit Plan	as a result of your rep	resentation?	No		(If "No" or "Unanswe	red" - go to 3d)		
3c - What cha	nges wo	uld like	to see mad	de to the Deposit Plan?	? New Policy: No	Amended Po		New Paragraph No	Amended Parac No	graph: New Or An No	nended Site: Other (see No	Notes):
					Notes:							
3d - If your re	presenta	ation rela	ates to a ne	ew, deleted or amende	ed site, did you submit t Site Name:	he site as a C	andidate S	Site? No	(If "Yes", p	•	ndidate Site Name and re	ference if known)
3e - Please s My comr	•			below: Reference 2407/CS Bry	nhill Golf Club.							
have on infrastruction	the surro cture alor ohic effec	ounding ng Port ct on the	area, both Road could e environm	from the envoromenta d not sustain the increa ent, not just locally, bu	al effect and loss of gre ase in traffic, particular	en recreationa ly if the 500 + l communities v	ll land. Th housing d which use	e effect of buil evelopment at the Port Road	ding an additional 180 Weycock takes place,	house developme This along with pr	ven the effect any addition nt would be immediately foposed development at V itional concerns that any	felt. The road Vhite Farm would have a
3f - Please ou	utline the	change	es you wish	to see made to the D	eposit Plan to make it s	sound (if releva	ant)					
4h - If you wis	sh to spe	ak plea	ase confirm	which part of your ren	presentation you wish to	speak to the	inspector	about and why	they consider it be ne	cessary to speak	at the hearing -	

Representor ID and details: 4988/DP1 Jenny Hughes							
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M □ 0 □	Additional SA SEA		Rep format: Eform	you want to speak		be consiered by 'written re ion of Public examination?	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound and o	does not not mee P2 - Yes			se indicate which test(s) th	at it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4 - `	Yes	
	Coherence and Effect	iveness Tests - CE1 -	Yes	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(27)			MG2		Conservation Area	Appendix 5 - Conservation Areas
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(1	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	? New Policy:	Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Amen	nded Site: Other (see Not	<u>es):</u>
	No	Yes I	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate \$	Site? No	(If "Yes", plea	ase give the Candio Site Refo	date Site Name and refere	ence if known)
3e - Please set out your representation below: The Vales proposal to build 20 houses in the Court Close	site does not appear to	o follow council guideline	es.				
The space would be unlikely to accomodate 20 houses be	uilt to modern specifica	tions.					
Potential drainage problems would be huge and may cause	se damage to houses in	o Orchard Close and our	house (Great H	ouse) which is a grade	2 star listed proper	rty of great Welsh historica	al significance.
The site is a greenfield site in a conservation area and I u	nderstand the council h	nas an obligation to look	at pre-existing b	rownfield sites first whic	ch is a sensible sus	stainable policy.	
Safety is a great concern as 20 houses potentially means to and from school and the bus every day and safety is al their dogs, there are sections wit no pavement. Also the ju	ready compromised, th	is extra number of cars	would cause an e	even greater safety risk.	. Elderly people in	the village use this lane a	cluding our own walk s do villagers walking
3f - Please outline the changes you wish to see made to the D Abandon this LDP plan or commit to looking at empty pro		, ,					
If there are no alternatives then consider building much re	duced numbers of hou	ses here to ensure safet	y, sustainability a	and preservation of a va	aluable conservatio	on site.	
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to	o speak to the inspector	about and why th	hey consider it be neces	ssary to speak at t	he hearing -	

Representor ID and details: 4989/DP1 Dr Stephen Jolles							
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0			Rep format: Eform	you want to speak	at a hearing sessi	pe consiered by 'written recon of Public examination?	P Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan					e indicate which test(s) th	
	Consistency Tests - C1 -	Yes	C2 - No	C3 - No	C4 - N		
	Coherence and Effectiveness	Tests - CE1 - N	lo	CE2 - Yes	CE3 - No	CE4 - Yes	
	Policy Number:	Paragraph N		Proposal Map:		Constraints Map	Appendices:
	MG2(27)					Conservation Area	Appendix 5 - Conservation Areas
3b - Do you wish to see any changes made to the Deposit Plan			<u> </u>	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Ame	nded Policy: Ne	ew Paragraph:	Amended Paragrap	h: New Or Amen	ded Site: Other (see Not	<u>es):</u>
	Yes No	No	0	No	No	Yes	
	Notes:						
3d - If your representation relates to a new, deleted or amended	I site, did you submit the site Site Name:	as a Candidate Sit	te? No	(If "Yes", plea	se give the Candid Site Refe	date Site Name and reference:	ence if known)
3e - Please set out your representation below: The plan to build 20 dwellings on this brownfield site in or number of dwellings represents an unacceptable intrusion position. The site is outside the natural boundary of the Vil The proposed site is alongside the Aberthin Conservation. Welsh history as there are so few of this type of house rem St Fagans Castle. The house at the rear is extremely close have already been 3 areas of listed wall which have collapsed due to water ingress by the previous owners and when we terms of the effects of drainage of surface water from the sthrough the grounds of the house which are likely to be adbuilding and tarmac. Building disruption is also likely to dis There are safety concerns associated with the increase in at increased risk of injury, aside from the diminished freeded that a highways inspector has found the A4222 in this area density. It is not clear that a full risk assessment has been Conservation area.	into the countryside and give age and will be clearly visible. Area and will have an impact naining in Wales or indeed the to the lane and increased treed one of which was adjace moved into the house in 200 clope above the house where versely impacted if additional turb the protected Barn Owls traffic of 20 dwellings as our on to roam for kids. The road to be too dangerous for a pet and will be clearly visible traffic.	on the size of the pro- e form the A4222 not the A4222 not the lane. Great to the lane. Great the 20 additional difful drainage is ne which nest within the size of the 20 additional difful drainage is ne which nest within the size of	oposed site sime ear the school, the in the Village on Ancient and gative impact on the House had a coming up between the Great House even milies children in 5.5m) and again and this danger	ply will not fit - the assuthe Downs and Pen-y-L - Great House which is Historic Monuments - to the structure. The land cellar to the rear (northed een the flagstones of the nned. In addition there natural surface water dery year and are cherist in the village play, run, riwidening would have e would only be increase	amption being that an in contavention a 400 year old Jac Greater Houses of was historically dern aspect) of the peground floor sugare areas of year rainage and ability ned throughout the de bikes, pick berryen wider impact to by the planned of	this is a form of rather cy of Council guidlelines. cobean building forming a Glamorgan). It is said to esigned for limited horse property which had to be a gesting a rather finely baround waterlogging and the to hold water of the slope Village. Ties and walk to and from than the proposed 20 dwellevelopment and its ramif	a significant part of be the little brother of drawn traffic. There abandoned and infilled lanced situation in the main drain runs ing plot is altered by school and would be ellings. I understand cations on traffic
3f - Please outline the changes you wish to see made to the De		if relevant)					
The plan as it stands should be declined for the reasons st							
4b - If you wish to speak, please confirm which part of your repr	resentation you wish to speal	to the inspector al	bout and why th	ey consider it be neces	sary to speak at th	ne hearing -	

Representor ID and	details:	4991/D	P1 Mr Gareth Davies							
Date Lodged Status 02/04/2012 M	Petitio	on and No.	Supporting Evidence	Additional SA SEA		Rep format: Comment form	*. .	t your comments to be ak at a hearing sessio	,	n representations' or do on? Written
2a - Do you consider t	he LDP	is Sound?	Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	I does not not meet P2 - Unans		of soundness, please	indicate which test(s) that it fails.
				Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Una	inswered C4 - Ur	nanswered	
				Coherence and Effec	tiveness Tests - CE1	- Yes	CE2 - Yes	CE3 - Unanswered	d CE4 - Unanswe	ered
3a - Which part of the	Deposit	Plan are y	ou commenting on?	Policy Number:	Paragrap	h Number:	Proposal Map:		Constraints Map	Appendices:
				MG2(28)						
3b - Do you wish to se	ee any cl	nanges ma	de to the Deposit Plan	as a result of your rep	oresentation? Yes	(If	"No" or "Unanswere	ed" - go to 3d)		
3c - What changes wo	ould like	to see mad	le to the Deposit Plan?	New Policy:	Amended Policy:	New Paragraph:	Amended Paragi	raph: New Or Amend	ed Site: Other (see I	Notes):
				Unanswered	Yes	Unanswered	Unanswered	Yes	Unanswere	d
				Notes:						
3d - If your represent	ation rela	ates to a ne	ew, deleted or amende		the site as a Candidate		` '	lease give the Candida Site Refer	ate Site Name and re ence: Candidate site	,
3e - Please set out yo Please see supp	•		pelow:				,			
3f - Please outline the	_	-	to see made to the Dexclude site (28).	eposit Plan to make it	sound (if relevant)					
4b - If you wish to spe	eak, plea	ase confirm	which part of your rep	presentation you wish	to speak to the inspecto	or about and why th	ney consider it be ned	cessary to speak at the	e hearing -	

(ordered by Representation ID No.)

Representor ID and details: 4991/DP2 Mr Gareth Davies	;					
Date LodgedStatusPetition and No.Supporting Evidence02/04/2012M0	Additional SA SEA		Rep format: Comment form		comments to be consiered hearing session of Public	d by 'written representations' or do c examination? Written
2a - Do you consider the LDP is Sound? Unsound	•	ne Plan is unsound and de P1 - Unanswered	oes not not meet o	` '	undness, please indicate w	hich test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - Unanswer	ed C4 - Unanswered	3
	Coherence and Effect	iveness Tests - CE1 - \	res (CE2 - Yes C	E3 - Unanswered CE4	- Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph N	Number: F	Proposal Map:	Constrain	ts Map Appendices:
	120					• • • •
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Yes	(If "	No" or "Unanswered" - g	o to 3d)	
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy: N	ew Paragraph:	Amended Paragraph:	New Or Amended Site: 0	Other (see Notes):
	Unanswered	Yes L	Inanswered	Unanswered	Unanswered L	Jnanswered
	Notes:					
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate S	ite? Unanswere	d (If "Yes", please	give the Candidate Site Na Site Reference:	ame and reference if known)
3a - Please set out your representation helow:						

OBJECTIONS TO POLICY MG 20 - TRANSPORT PROPOSALS

The Policy excludes provision for a Llysworney By-pass

Policy background

Provision for a Llysworney By-pass is included in Policy TRAN 2 of the Vale of Glamorgan UDP, which was adopted as recently as 2004. The supporting text for Policy TRAN 2 says: "the scheme is important to relieve environmental and safety problems caused by a significant number of heavy lorry movements through the village. At present, the lorries use the B4270, which runs through the village of Llysworney, as it provides a major access route to the A48 for businesses located on the industrial estates".

Page 40 of the Vale of Glamorgan Local Transport Plan Annual Progress Report 2005 (which is the most recent one) says:

"The Council's support for highway schemes in the LTP including by-passes around the villages of Llysworney, Gileston and Boverton, remains. However, notwithstanding the feasibility work that has been undertaken for a new Airport Access Road, grant funding for these new road schemes has not received WAG support through the Transport Grant process".

The Llysworney scheme was still included in para 7.110 of the Vale of Glamorgan Local Transport Plan, which ran to 2006. But it isn't in the SEWTA RTP Capital Programme to 2015 and has been superseded in priority in Policy SP 7 of the LDP Written Statement by 5 other transport schemes.

Accordingly, despite the By-pass scheme having been recognised in development plan policy for some 30 years, it has suddenly disappeared from the new LDP apparently without written explanation. The verbal explanation provided by the Planning Officer is that the other transport schemes identified in Policy SP 7 have higher priority and that there is no reasonable prospect of gaining public funding for the Llysworney scheme in the foreseeable future.

Identified need for the By-pass scheme

The current problems experienced in the village are summarised on page 10 of the 'Llysworney Conservation Area Appraisal and Management Plan' 2010 as follows:

"Because of its location on a busy traffic route, and despite a 30 mph speed limit, the top part of the village is blighted by fast moving traffic. Vehicular movement to the south is also constrained by the narrowness of the road as it leads up the hill towards Llantwit Major, which in places only allows a single vehicle to pass".

(ordered by Representation ID No.)

Representor ID and details: 4991/DP2 Mr Gareth Davies

In 2008, during the course of the preparation of the Conservation Area Appraisal, a questionnaire was delivered to all the properties in Llysworney and two of the main problems identified by local residents were volume and speed of traffic travelling through the village and damage to hedges and erosion of verges by large vehicles.

In their evidence to the UDP Inquiry in 1998, the Llysworney Community Association presented an excellent case in support of the need for the By-pass. Since that time, traffic congestion has continued to increase and the RAC foundation estimates that traffic volumes are set to increase in the UK by 43% to 2035. In addition to the problems which the local residents experience in the village, there are also serious capacity (peak am & pm) and safety problems at the Pentre Meyrick junction on the A48, which also provides access to the Ruthin Road (the main link to the M4 in this part of the rural Vale).

The Planning Inspector who reported on the objections to the UDP in November 2000 supported the need for a new road link between the A48 and the B4270. In that case, a new link road (as part of the Darren Farm housing scheme) was being proposed as an alternative to the Llysworney By-pass but he identified the following benefits which would have been the same as those for a by-pass:

Allowing a weight restriction ban to be imposed for the village of Llysworney, thereby removing extraneous heavy goods traffic and relieving the environmental and safety problems caused by the significant number of heavy lorry movements through the village

Allow a significant proportion of the extraneous car traffic to choose to re-route away from the village

As explained in para C7.1.11 of the Inspector's report, the link road would not have offered all the same benefits as a by-pass or "a complete solution to the traffic problems in Llysworney (and) it would provide only limited relief to Cowbridge". In para C7.12 he alluded to the difficulties in finding public funding for the By-pass but in para C.1.16 concluded that the link road would have produced substantial environmental benefits for Cowbridge and Llysworney.

I refer to the Inspector's conclusions and recommendations (on Highways & Traffic) for Appeal Ref: APP/Z6950/A/02/1096305 & APP/Z6950/A/03/1108352 – 145 dwellings on land between the A48 and Llantwit Major Road (Darren Farm) January 2004. His conclusions on a By-pass (or link road further to the east which was to be funded by the housing scheme) may be summarised as follows:

Para 12.31 – the main benefit of a By-pass would be to remove all through traffic from Llysworney and maintain the direct route to the A48 and M4 from the south

The diversion of HGV and other traffic away from Llysworney, which is a Conservation Area, would undoubtedly be a significant improvement for the local environment and amenity, given the proposed expansion of the Llandow business area under UDP policy. Although he qualified this by saying that the link road would not have had the same benefits as a By-pass in reducing non-HGV traffic through the village

The link road would have reduced westbound traffic in the pm peak on Cowbridge High Street by up to 25% (with an overall reduction in 2-way flows of 4% in the morning and 11% in the evening). And I believe there is no reason why a By-pass should not have a similar beneficial effect (see section 4 below)

In respect of eastbound traffic, there would be a small improvement by diverting traffic way from the B4270 passing through the built-up area of Cowbridge and the Crossways junction (which has very restricted visibility – see para 12.39). And I believe that this improvement could be enhanced by signage at Nash corner and other traffic control measures to discourage traffic using the B4270 as a through route (see section 4 below)

Economic reasons to include provision for a Llysworney By-pass in Policy SP 7 & MG 20

Para 3.21 of the LDP says that it will seek to provide a policy framework which improves and enhances key transport links to and within the Vale for the benefit of residents, visitors and business. The B4270 through the village of Llysworney and the Ruthin Road from Pentre Meyrick to Pencoed provide the key transport link for the western Vale to the M4 at junction 35. Despite the problems identified above, there is no provision in the LDP to address these

More than 22ha of employment land was allocated in the UDP on the Vale Business Park and Llandow Trading Estate but empirical evidence shows that there has been only limited success in trying to attract new firms. This is confirmed by the findings of the Council's own Employment Land Study, which attributes part of the problem to poor access

Policy MG 24 (4) of the LDP identifies land to the south of Ruthin Quarry as a long-term limestone reserve (approx 30m tonnes). Although the quarry is inactive at present, the limestone reserve is of high quality and has been used in the past to supply Aberthaw Cement works and is likely to do so in the future. One of the main constraints on the viability of the operation was the additional cost of re-routeing lorries carrying the stone via the B4265, so as to avoid travelling through Llysworney Village.

Not only did this have environmental implications for residents along that route (in Ewenny, St Brides & Wick) it also increased significantly the carbon foot-print of the operation because of the additional transport mileage. Accordingly, the provision of the By-pass is likely to be of benefit to both the local quarrying industry and to Lafarge at Aberthaw, which is one of the single largest employers in the Vale

(ordered by Representation ID No.)

Representor ID and details: 4991/DP2 Mr Gareth Davies

An up-graded B4270/Ruthin Road link to the M4 would enhance considerably the potential for the allocations identified by Policy MG 12 (2) & (3) to be realised

Funding & Design of the By-pass scheme

Even in 1998, the Llysworney Community Association concluded that the only practicable option for the provision of the Llysworney By-pass lay in a privately-funded scheme, and that remains the case today. The consortium of builders promoting the new settlement on Candidate Site 182/CS.4 at Llandow Airfield have undertaken to provide the By-pass and implement related highway improvements if they were able to develop approx 2,750 units.

Some of the environmental, congestion and safety benefits that would accrue from the new By-pass have been described above but there would be other benefits as well and these could be augmented by additional measures:

The sub-standard junction at Pentre Meyrick Cross on the A48 has serious congestion problems (particularly pm week-days) and a poor accident record. These problems would be addressed by the construction of a new roundabout in this location; together with improvements at Nash Corner and to other sections of the B4270 & B4268 routes - funded as part of Llandow Newydd

An HGV weight restriction (bus & access only) could be placed on the B4270 route between Nash Manor and Cowbridge to improve the amenity of residents along the route; and alleviate congestion and junction geometry problems at the Llantwit Road/Westgate Street junction in Cowbridge

There is also a serious access problem associated with Llwvnhelig Farm in Cowbridge, which could be ameliorated by the construction of a Llvsworney By-pass. This is an industrial-scale farm containing both food and green-waste composting plants, and which is the main composting facility for this type of waste in the Vale of Glamorgan; as well as processing waste from further afield.

At present, the only access for agricultural and composting HGV's is via the sub-standard entrance off the A4222 route adjacent to Llwynhelig House. The farm wishes to replace this with direct access off a new roundabout on the A48, located at the western end of the Cowbridge By-pass (where the dual carriageway ends). It cannot be achieved at present, because a new roundabout here would also create ingress for west-bound traffic (doubling-back eastwards on the A48) to get into western Cowbridge to avoid the congested Eastgate and Cowbridge High Street; but also using the shorter B4270 route through the built-up area of Cowbridge to get to Llandow and Llantwit Major (avoiding Llysworney). Accordingly, under present circumstances, a new roundabout on the A48 would undoubtedly have the undesirable implication of transferring much of the HGV and other traffic that currently uses the B4268 through Llysworney onto the B4270, to the detriment of residents living along that route.

A comprehensive traffic management scheme associated with the construction of the Llysworney By-pass would enable these problems to be resolved. Providing a new access to Llysynhelia Farm: re-directing through traffic away from the congested centre of Cowbridge; and improving the environment of those living along the B4270 route between Cowbridge and Nash Manor.

This will be the subject of more detailed evidence and explanation in support of Candidate Site 182/CS.4 at the 'Alternative Sites' stage of the LDP.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) I wish to see an amendment to Policy MG20 to include provision for the Llysworney By-pass

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

(ordered by Representation ID No.)

Representor ID and details: 4992/DP1 Renate Askew							
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA		Rep format: Comment form	, ,		be consiered by 'written ion of Public examination	•
,	2b - If you think that the F Procedural Tests - F Consistency Tests - C Coherence and Effective	P1 - Yes C1 - Yes	P2 - Yes C2 - Yes	`,	soundness, pleas C4 -	`,	that it fails.
, , , , , , , , , , , , , , , , , , , ,	Policy Number: MG9. MD12. MG2	<u>Paragraph N</u> 6.49. 6.52.		Proposal Map: MG9)	Constraints MapFeb 2012	Appendices: Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repres	entation? Yes	(If "	No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?			w Paragraph: nanswered	Amended Paragrap Unanswered	<u>New Or Amer</u> Yes	ded Site: Other (see N Unanswered	
3d - If your representation relates to a new, deleted or amende	d site, did you submit the Site Name: Land East o		e? Yes	(If "Yes", plea	· ·	date Site Name and reference: Site reference	erence if known) MG 9 / ID 22 Appendix 1
2a Diagon ant out your representation heleum							

3e - Please set out your representation below:

The proposed Gypsy traveller site would be situated on a greenfield area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the Council's own report – Fordham report)

I do not support this unfair proposal, the Council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

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

TEST P1

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

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible — we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

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

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

TEST C1

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

TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;

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- offers very limited access to public transport facilities:
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

TESTC3

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

TESTC4

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

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

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

the proposed LDP and "Manual for Streets".

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

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

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

TEST CE1

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

- The Strategy makes the following statements:

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

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

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

- The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

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

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Representor ID and details: 4992/DP1 Renate Askew

Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

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

TEST CE2

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

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport."

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Representor ID and details: 4992/DP1 Renate Askew

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Representor ID and details: 4992/DP1 Renate Askew

TEST CE3

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

TEST CE4

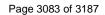
- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

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

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



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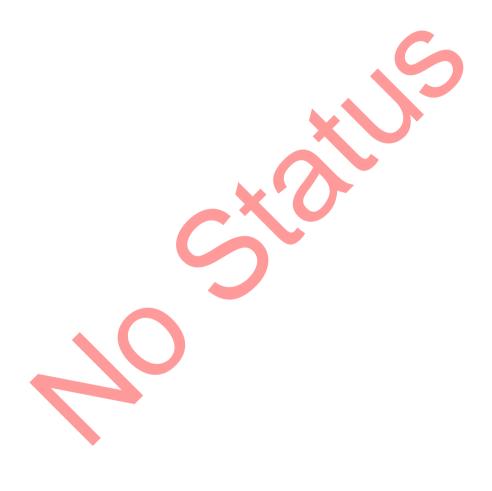
Representor ID and details: 5006/DP1 Rachel Cahalane	
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?
·	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
, , ,	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(19). MG2(20).
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Unanswered
	Notes:
	d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below: VALE OF GLAMORGAN DEPOSIT LOCAL DEVELOPME	NT PLAN 2011-2026
I refer to the above plan and my comments are as follows:	
As a resident I wish to express my major concerns regard	ng the implications of the effect that the proposed additional housing would have on the local highways network.
	ional houses will be build on the St Cyres annexe site and Caerleon Road. The 400 houses would generate between 600 to 800 additional cars in both would have a profound and adverse impact on the community as the existing roads are under great pressure now.
To add to that, there are already 2000 houses approved a drive through Dinas Powys, using both the main road and traffic is Dinas Powys expected to take?	Barry Waterfront, to be built in the period from now until 2020. It is inevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y Turnpike. St. Andrews Road and Britway Road will also be affected. How much more
	eady affected at present by the amount of traffic coming from the Barry direction that travels on the alternative route through Station Road, Mill Road sof cars, particularly at peak times. Michaelston-le-Pit would also be affected at its junction with the Pen-y-Turnpike Road. An increase in vehicles, polluting emissions from vehicles.
	posed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for use to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.
The Deposit plan also does not indicate what measures w trains will be a major challenge.	Il be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra
Additional buses would simply be caught up in the traffic of	haos that the extra housing in Dinas Powys would cause.
	ements are made BEFORE hundreds of additional houses could even be considered.

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

(ordered by Representation ID No.)

Representor ID and details: 5006/DP1 Rachel Cahalane

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



Representor ID and details:	5009/DP1 Mrs D R Thomas					
Date Lodged Status Petition 30/03/2012 M	and No. Supporting Evidence 0	Additional SA SEA		Rep format: Letter	4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?	
2a - Do you consider the LDP is		Procedural Tests - Consistency Tests -	P1 - Unanswered C1 - Unanswered	P2 - Unansv	swered C3 - Unanswered C4 - Unanswered	-
3a - Which part of the Deposit F		Policy Number:	veness Tests - CE1 - Paragraph		CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered Proposal Map: Constraints Map Appendices:	
3b - Do you wish to see any cha	anges made to the Deposit Plan	as a result of your rep	resentation? Unansw	ered (If	If "No" or "Unanswered" - go to 3d)	
3c - What changes would like to	see made to the Deposit Plan?	New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered	
3d - If your representation relat	es to a new, deleted or amende	d site, did you submit t Site Name:	he site as a Candidate	Site? Unanswer	ered (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:	
criteria. a. Any change would have b. There would be a reduc c. Any alteration to existing d. Based on the above iter e. There may well be a ne	07 /CS1	d landscaped areas. be used for general leis ad and communications o safety issues within t ironmental issues.	sure purposes. s systems could not cop he community i.e. school	e.	n. I base my support on the following factors which I would stress are not in any order of	
3f - Please outline the changes	you wish to see made to the De	eposit Plan to make it s	ound (if relevant)			-
4b - If you wish to speak, pleas	e confirm which part of your rep	presentation you wish to	speak to the inspector	about and why the	they consider it be necessary to speak at the hearing -	

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

Representor ID and details: 5015/DP1 John Burns			
Date Lodged Status Petition and No. Supporting Evidence 29/03/2012 M 0	Additional SA SEA		comments to be consiered by 'written representations' or do hearing session of Public examination?
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of sour P2 - Unanswered	ndness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswere	d C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Unanswered CE	3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
	MG2(27)		
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswer	red (If "No" or "Unanswered" - go	to 3d)
3c - What changes would like to see made to the Deposit Plan?			New Or Amended Site: Other (see Notes): Unanswered Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Sit Site Name:	ute? Unanswered (If "Yes", please gi	ive the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: Land Adjacent to Court Close, Aberthin - MG2 (27)			
reflected in the number of cars parked with impunity on th supply lorry and "Biffa" lorries, collecting glass and pub we the pub having wooden plant boxes adjacent to the lane, t	1,00660 and 1985/00647) was rejected almost 3 not. The pub used to be a quiet country one, be double yellow lines alongside the pub in "the laste. We then of course have the local weekly chat traffic exiting the lane by turning left, (i.e. Co	30 years ago, because of dangerous egress but has since developed into a busy pub cum ane" on a daily basis. In addition to this we collection of food waste and also garden was bybridge direction) veer to the right side of the	onto the A4222 at the junction. The pub has changed a restaurant, resulting in a larger number of clientele. This is
If the current proposals go ahead (and I appreciate that he rejection of the Court Close development plan until this ha		ential that an Aberthin by-pass be construct	ed first. This has been done to good effect in Coity. I urge
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)		
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector a	about and why they consider it be necessary	to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details:	5017/DP1 W Williams							
Date Lodged Status Petition 02/04/2012 M	on and No. Supporting Evidence 0	Additional SA SEA		Rep format: Letter	, ,	our comments to be cat a hearing session of	,	•
2a - Do you consider the LDP	s Sound? Unanswered	2b - If you think that the Procedural Tests - Consistency Tests -	P1 - Unanswered	P2 - Unansv	` '			nat it fails.
		Coherence and Effecti	iveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswere	ed
3a - Which part of the Deposit	Plan are you commenting on?	Policy Number: MG2(19). MG2(20)			Proposal Map:	_	onstraints Map	Appendices:
3b - Do you wish to see any ch	anges made to the Deposit Plar	as a result of your rep	resentation? Unansv	vered (If	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like	o see made to the Deposit Plan	? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragraph Unanswered	h: New Or Amended Unanswered	Site: Other (see No Unanswered	tes):
3d - If your representation rela	ates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site? Unanswere	ed (If "Yes", pleas	se give the Candidate Site Referen		ence if known)
20 Diagon and aut your range	contation below							

3e - Please set out your representation below:

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

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

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

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

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

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

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

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

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

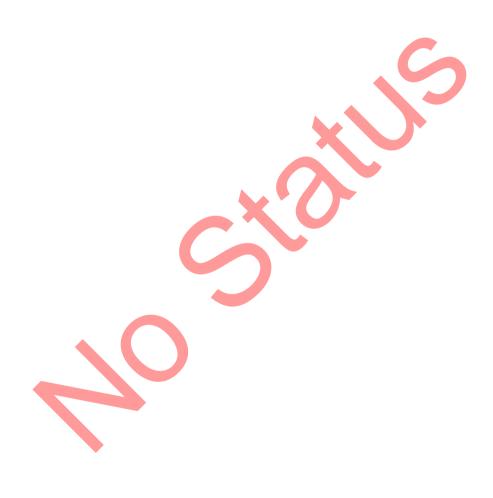
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 5017/DP1 W Williams

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

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



Representor ID and details: 5018/DP1 S Long	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA Rep format: Letter 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?
, and the second	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(19). MG2(20)
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Notes:
•	d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below: Vale of Glamorgan Deposit Local Development Plan 2011	-2026
	in sections MG 2 [19] and MG 2 [20] on pages 134 and 135 respectively of the written statement in respect of the above. These proposals are for the ing St.Cyres School, Murch Road and 60 residential dwellings on land off Caerleon Road, Dinas Powys.
	cardiff Road has suffered from chronic traffic congestion and most recently the construction of a bus lane at the section leading to the Merrie Harrier has amon to see buses choosing to use the normal carriageway rather than the bus lane. The construction of 400 additional residential properties will only
Furthermore, the significant additional traffic generated will end of the school day will further adversely contribute to co	most certainly lead to chronic congestion at the Infant's School traffic lights at Murch Road. Cars which already park along Murch Road at the start and ongestion in this location.
The area to the front of the shops in Castle Drive near the junction with Murch Road. Not infrequently, large delivery I Drive and this situation has deteriorated since the opening	junction is already a severe traffic bottleneck with vehicles parking not only in the designated bays outside the shops, but also opposite, right up to the orries park on the road opposite the shops causing a potentially serious hazard. As a consequence it is frequently difficult to turn into, or out of Castle of the Tesco Express store.
	re, cars often travel at excessive speeds, unsuitable in a high density residential area, and this together with the congestion around the shops makes for cidents. The construction of a further 60 residential properties off Caerleon Road, producing greater footfall and traffic volumes, will only worsen an
In summary, the present infrastructure, particularly transpo	ortation is woefully inadequate to support these specific proposals and I therefore wish to register my strongest objections.
3f - Please outline the changes you wish to see made to the De	
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5019/DP1 J F Bloodworth		
Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0		Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Unanswered
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Plan is unsound and d Procedural Tests - P1 - Unanswered	does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. P2 - Unanswered
	Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered	C2 - Unanswered C3 - Unanswered C4 - Unanswered Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph I	Number: Proposal Map: Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unanswe	ered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan'		New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered
	Notes:	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate S Site Name:	Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: Ref 150 houses in Llandough:		
LDP six months late. Procedure be extended.		
Traffic in and through Llandough already problematic. Preextra houses in Vale LDP.	oblems - Merrie Harrier traffic lights, Penlan Roa	ad, Llandough Hill. This is before all the extra work being carried out in Llandough Hospital and all the
150 houses - poss 150 children to go to school. Llandou	gh School is full we were told? Poss 200-300 ex	xtra cars?
Llandough Hill will be chock-a- block queuing up Llandou	gh Hil. Cars already queuing from Penarth to Ba	arons Court roundabout.
There are no facilities in Llandough now. Visitors and pat	cients from hospital will try to cross Penlan Road	d. Even now it takes 40 minutes to get from Dinas Powys to Llandough poss accidents.
Two rights of way in the field Cogan Pill Road - Penarth R	coad rear birds, bats, wild animals. Unsuitable a	ccess and egress.
Therefore this LDP should not be allowed.		
3f - Please outline the changes you wish to see made to the D	reposit Plan to make it sound (if relevant)	
4b - If you wish to speak, please confirm which part of your rep	oresentation you wish to speak to the inspector	about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor II	D and d	etails:	5020/D	P1 Redrow Homes S	outh Wales & Brynhill	Golf Clu	b, c/o Agent							
Date Lodged 02/04/2012	Status M	Petition	on and No. 0	Supporting Evidence	Additional SA SEA			Rep format: Comment for		- do you want your u want to speak at			•	representations' or do n? Examination
2a - Do you cor	nsider th	ne LDP	is Sound?		2b - If you think that t Procedural Tests -		is unsound a Unanswered			more test(s) of so	undness, pleas	se indicate	which test(s) t	hat it fails.
					Consistency Tests -	C1 -	Yes	C2 - Yes		C3 - Unanswe	red C4 -	Unanswere	ed	
					Coherence and Effect	tiveness	Tests - CE	1 - Yes	CE2 - \	Yes C	E3 - Unanswe	red CE	4 - Yes	
3a - Which part	t of the I	Deposit	Plan are y	ou commenting on?	Policy Number:		Paragra	aph Number:	Propos	al Map:		<u>Constrai</u>	nts Map	Appendices:
					16. 48. 88		3.8. 3.9	9. 3.10. 3.14.						
3b - Do you wis	sh to see	e any ch	nanges ma	de to the Deposit Plan	as a result of your re	presentat	tion? Yes	((If "No" o	or "Unanswered" - g	go to 3d)			
3c - What chan	nges wo	uld like	to see mad	le to the Deposit Plan?	New Policy: Unanswered Notes:	Amen Yes	ded Policy:	New Paragraph: Yes	_	ended Paragraph: answered	New Or Amer Yes		Other (see No Unanswered	otes):
3d - If your rep	oresenta	ition rela	ates to a ne	ew, deleted or amende	d site, did you submit Site Name: Land at				rry	(If "Yes", please	•	idate Site N		rence if known)

3e - Please set out your representation below:

On behalf of our client, Redrow Homes South Wales and Brynhill Golf Club, we set out below representations to the Deposit Draft Local Development Plan (LDP) out for Consultation until 2nd April 2012. The representations below are accompanied by the requisite 'representations form' and 'new or alternative site appraisal form'.

Redrow Homes South Wales and Brynhill Golf Club consider that whilst parts of the emerging LDP are sound, other areas are unsound. The representations below are set out within the context of the 'Test of Soundness' and recommend the changes necessary that would make the emerging Plan sound.

Section 3: The Spatial Profile of the Vale of Glamorgan, paragraphs 3.8-3.9 - Object

The LDP notes in paragraphs 3.8 to 3.9 the proximity to Cardiff and the impact that this has on the housing market in the Vale of Glamorgan. Similarly, the economic relationship between the Vale and Cardiff is also explained in paragraphs 3.10-3.14. Despite these references it is unclear how these cross boundary issues have been taken into account in relation to the housing strategy and scale of the housing land release. It is clear that significant employment land provision has been made that reflects the Wales Spatial Plan priorities for the sub region but it is unclear how sub regional housing issues are being addressed.

PPW section 2.2 sets out a requirement for collaborative working between local planning authorities on issues of a strategic nature. This approach is expanded upon in paragraph 9.2.2 and is also recognised in the Wales Spatial Plan. Whilst it is understood that the Vale of Glamorgan has been a participant in recent Cardiff Council initiated work regarding the sub regional consequences of the emerging Cardiff LDP it is unclear how this process has informed the Deposit Vale LDP given the accepted cross boundary market issues.

As it stands, the emerging LDP is contrary to the Tests of Soundness C1 and C2, as the LDP Strategy fails to address plans, policies and strategies of adjoining areas. Likewise, as the emerging LDP remains quiet on collaborative working, it remains contrary to national planning guidance.

The emerging LDP therefore needs to set out explicitly what account has been taken of sub regional housing market issues and the anticipated shortfall in housing provision in Cardiff against the latest household projections.

Policy SP3 - Residential Requirement - Object

Based upon a modification of the most recent household projections the emerging LDP identifies a dwelling requirement of 9,950 (2011-2026). Whilst this follows the guidance in PPW to use household projections as a starting point it does not provide any analysis of how it relates to other LDP objectives or sub regional context. NLP is particularly concerned that there is a significant internal conflict within the plan between housing and employment objectives.

(ordered by Representation ID No.)

Representor ID and details: 5020/DP1 Redrow Homes South Wales & Brynhill Golf Club, c/o Agent

Housing & Economic Growth Strategies

The Population & Housing Projections Background Paper (Nov 2011) sets out in detail the components of the population and household change and in Table 16 the Council's preferred position (Option 1). Table 16 highlights the changing demographic structure and in particular the significant aging of the population and the impact this has on the size of the population of working age.

Over the period 2011-26 whilst the Council's proposed level of new housing provision will allow for an overall population increase of 12,882 (138,686-125,804) this only delivers an increase in the 18-59/64 age group of 373 persons.

The Council has failed to take any account of the aging population structure and the fact that significantly more housing growth will be required to both house this existing aging population and allow for necessary economic growth. It is essential that the LDP facilitates sufficient housing to match its own economic growth aspirations that in turn will also provide the necessary local and national government revenue to support the aging population and fund service provision.

Policy SP5 identifies a total employment allocation of 277ha to meet both strategic and local economic growth aspirations. In the supporting text, reference is made to the strategic allocation of 217ha generating 12,000 to 15,000 additional jobs sub regionally. From the above analysis the Vale's LDP Housing Requirement will be sufficient to provide housing for only 373 of these additional workers.

Whilst it is acknowledged that the level of jobs created directly in the Vale of Glamorgan arising from the LDP employment allocations will be significantly below the above headline level it is anticipated even at average employment densities that 277ha that the employment strategy has the potential to create over 5,000 new jobs locally. There is therefore a serious and significant disparity between proposed levels of house building and economic growth aspirations. As it stands, the disparity between the proposed levels of house building and the Council's economic aspirations presents the danger of promoting unsustainable patterns of development that encourages significant in-commuting.

The Council's employment evidence base dates from 2007 and is therefore outdated and needs to be reviewed urgently. The labour supply forecast set out in table 40 of the Council's Employment Land Study is incorrect as it is based upon the total population rather the population of working age. It therefore significantly over estimates the increase in economically active arising from the demographic projections.

Sub Regional Housing Issues

The Welsh Government 2008 based Household Projections estimate a growth in Cardiff of 56,100 households (2008-2028) or 2,800 households per annum. In its LDP Options Paper Cardiff consulted on three scenarios of housing growth ranging from 1,825 - 2,720 dwellings per annum i.e. all below the forecast level of household growth.

Cardiff Council engaged Edge Analytics to review the Welsh Government's population and household projections in 2011. Edge Analytics highlighted what they regarded as a deficiency in the Welsh Government's projection methodology particularly in relation to methods for estimating international migration. Using the Edge Analytics approach the household change for Cardiff reduces (2008-2026) to an annual average of 2,175 households per year. Once households are converted to dwellings this level of growth is similar to Option B the middle of the Council's three scenarios (2,270 per annum).

In recalibrating the migration element of the model Edge Analytics redistributed international immigration across local authorities in southeast Wales including the Vale of Glamorgan. The consequence is that Edge Analytics using what they consider to be more robust migration data argue that the population of the Vale of Glamorgan is under estimated by 4,000 over the period 2008-2026. Applying an average household size of 2.15 this would equate to an additional 1,550 households over a 15 year period.

The Cardiff LDP evidence base is yet to be tested whilst the Preferred Strategy setting out the Council's preferred level of growth is not anticipated until October 2012. It is clear however that there is a distinct possibility that Cardiff will not meet its household projection in full and that this would have implications for adjoining authorities.

The Vale of Glamorgan LDP and its Background Papers are silent on the extent to which there has been any cognisance of these sub-regional housing issues. In contrast to the LDP employment strategy, the housing strategy is entirely inward looking with no recognition of the need for flexibility to deal with wider sub regional housing issues. Policy SP3 is therefore considered contrary to the Test of Soundness CE1, CE2 and CE4.

Affordable Housing (Policy MG5 — Object)

The significant level of affordable housing identified by the Vale of Glamorgan is in part due to the past under delivery of open market housing. A continued under delivery of housing against demand, particularly given the economic drivers outlined above, will further increase competition in the housing market to the detriment of affordability.

Evidence from the LHMA points to a need for 915 affordable homes per annum in the first five years of the plan. This in itself brings into question the Council's proposed annual housing requirement figure of only 665 dwellings. Experience of viability from recent planning applications within the Barry and the coastal area indicate that a 30% affordable housing requirement figure is very ambitious and could prevent schemes coming forward unless a flexible attitude is adopted. It is therefore considered that as it stands, drat Policy MG5 is contrary to the Test of Soundness CE2 and additional flexibility needs to be worked into the policy to ensure it is sound.

(ordered by Representation ID No.)

Representor ID and details: 5020/DP1 Redrow Homes South Wales & Brynhill Golf Club, c/o Agent

In reality a greater level of affordable housing will be delivered if additional allocations are identified and a more realistic affordable housing target is set that is less likely to deter development coming forward. This is particularly important given the increasing regulatory burden associated with building regulations and the introduction of CIL.

Conclusion

Demographic, employment, sub-regional analysis and affordable need as set out above all indicate that the housing requirement figure should be increased by a minimum of 1,550 households. In order for Policy SP3 to be considered sound, on behalf of our client, we request that the housing requirement figure is revised to a minimum of 11.500.

Policy MG1 — Housing Supply - Object

On behalf of our client Redrow Homes South Wales, we request that the housing requirement figure be increased by a minimum of 1,550 to 11,500. As a result, additional housing allocations are required to ensure that this requirement figure can be achieved including a 10% flexibility allowance against non-delivery of sites.

The LDP makes a very substantial allowance of 2,183 dwellings for large windfall sites. The LDP should be seeking to provide greater certainty regarding the location and source of future housing provision rather than relying on major windfall consents in locations that may not be consistent with the settlement strategy.

Significant progress has been made in redevelopment of the remaining major brownfield sites and whilst it is acknowledged that the Council has assumed a diminishing rate, even this appears ambitious. We therefore consider that Policy MG1 is contrary to the Tests of Soundness CE2 and CE4.

In order for Policy MG1 to be considered sound, the Council should provide further evidence that significant urban capacity remains for the scale of windfalls proposed. In addition, it should be clarified whether the large windfall allowance assumes for the release of greenfield as well as brownfield sites.

Furthermore, land at Brynhill Golf Club should be allocated under Policy MG2 for residential development to meet the shortfall of housing land required and reduce the need to rely on unidentified windfall sites in less sustainable locations. The enclosed new or alternative site appraisal' form sets out how the site is compatible with the LDP strategy and how it will assist in meeting the LDP objectives.

The proposed residential development At Brynhill Golf Club seeks to facilitate the delivery of a new Club House/Community Venue, a new practice area and four new fairways all within the existing boundaries of the golf course. These represent fundamental enhancements that are crucial for the longer term viability of Brynhill Golf Club. Without the enabling residential development. Brynhill Golf Club can not compete against more recently established golf courses within the sub-region which offer better facilities. The proposed improvements will reverse the decline in membership, protecting and increasing employment opportunities. They will also ensure golf facilities are available for Barry's population, together with the associated health and community benefits involved for those participating.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -We wish to present our case in further detail to the Inspector on matters concerning the overall housing requirement, supply and further necessary allocations.

We consider it more appropriate to discuss these issues in their entirety at the Examination, rather than rely solely on written representations.

Representor ID and details: 5030/DP1 Lee Crompton	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered C3 - Unanswered C4 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered C63 - Unanswered C63 - Unanswered C64 - Yes
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(19)
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Yes
	Notes: An amended Delivery and Implementation Table
	ed site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Land at Meliden, Dinas Powys Site Reference: 2410/CS1
3e - Please set out your representation below:	
The inclusion of the land at Meliden within Housing Land	allocation MG2 (19) is welcomed.
The Delivery and Implementation Table which details indiwill be implemented. The Table estimates the likely comp	vidual site allocations and provides information on location, size, proposed use and the number of units. It also provides an indication of when proposals letion of development in terms of three Plan phases:
Phase 1 – 2011 to 2016 Phase 2 – 2016 to 2021 Phase 3 – 2021 to 2026	
Plan period as firm house builder interest exists. Once the	e, the likelihood is that the part of the wider housing land allocation – MG2 (19), i.e. land at Meliden, Dinas Powys, will be developed in Phase 1 of the LDP is adopted in approximately 18 months to 2 years time, and a planning application approved, there would be no reason why a start could not be land services are readily available. Part of the site already has planning permission for a replacement dwelling.
The likely uptake of the site, independently of the St Cyrecategory and one which could be deliverable in Phase 1 of a part is proposed to be developed in Phases 2 and 3 i.e.	s Lower School site being released within the first 5 years of the plan, emphasises that there is a need to include the submission site in a separate of the Plan period. For this reason the Delivery and Implementation Section of the Deposit Plan is objected to as the site, which the land at Meliden forms 2016-26.
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)
which would allow for its development independently of the	Implementation Table which would refer to the privately owned land at Meliden as being considered separately with independent access arrangements e St Cyres Lower School Site, under Policy MG2 (19).
	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details:	5031/DP1 Dr Jayne Sara Hu	ınt						
Date Lodged Status Petitio 31/03/2012 M	n and No. Supporting Evidence 0 ✓	Additional SA SEA		Rep format: Comment form	·	our comments to be cat a hearing session of	,	•
2a - Do you consider the LDP is		Procedural Tests -	he Plan is unsound and P1 - Yes C1 - Unanswered	P2 - Yes	one or more test(s) of			at it fails.
			tiveness Tests - CE1		CE2 - Yes	CE3 - Unanswered		d
3a - Which part of the Deposit I	,	Policy Number: MG2	<u>Paragrap</u> 5.11		Proposal Map: MG2 (ID 30); R allocations table (page Supply Background P 2011)	esidential	onstraints Map	Appendices: Other - Not Listed
3b - Do you wish to see any ch	anges made to the Deposit Plan	as a result of your rep	oresentation? Yes	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to	o see made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Yes	New Paragraph: Unanswered	Amended Paragram Yes	h: New Or Amended Yes	Site: Other (see Not Unanswered	es):
3d - If your representation rela	tes to a new, deleted or amende		the site as a <mark>Candid</mark> ate den Empo <mark>riu</mark> m, Fferm ((If "Yes", plea	ase give the Candidate Site Referen	Site Name and reference: ID30 in the draft I	
3e - Please set out vour repres	sentation below:							

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

Summary

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

(ordered by Representation ID No.)

Representor ID and details: 5031/DP1 Dr Jayne Sara Hunt

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

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

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

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

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

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

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

TEST C2 - It does not have regard to National Policy

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

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

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

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

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

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

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

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

Llangan primary school

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

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

Highway safety issues

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

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

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

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

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

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

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

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

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

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

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

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

The extant planning permission for the Garden Emporium site includes:

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

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

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

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

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

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

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4,6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

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

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

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because

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there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST C5 - The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" - The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." - The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" - The proposed development of the Garden Emporium site represents overdevelopment of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

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TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full '3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

- f) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",
- g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.

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- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. ' –

In relation to point 1, above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

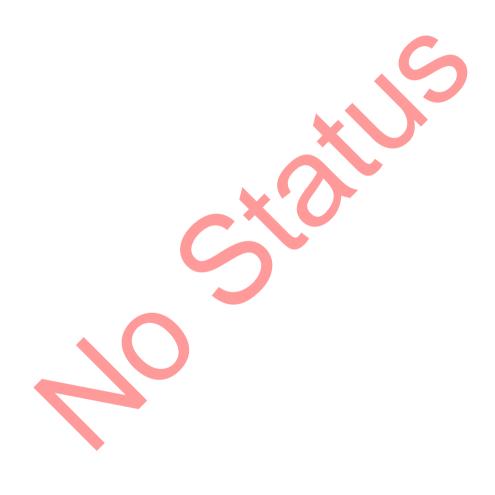
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - a) Section 5.11 (page 26)- delete Fferm Goch from the list of Minor Rural Settlements
 - b) Policy MG2 (page 74)-amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12
 - c) Residential allocations table (page 145)- amend number of dwellings at The Garden Empoorium, Fferm Goch from 40 to 12
 - d) Proposals map- amend to exclude back area of site MG2(30) identified as habitat area edged green on attached plan
 - e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Empoorium, Fferm Goch number of units should be 12, not 220
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing Paragraph 5.11 (designation of Fferm Goch as a minor rural settlement)

Representation ID No.)

Representor ID and details: 5031/DP1 Dr Jayne Sara Hunt

Policy MG2 (allocation of the Garden Emporium Site, Fferm Goch for 40 houses)

I am concerned that my representations may be dismissed by the Council and I would like the opportunity to make sure they have been understood.



(ordered by Representation ID No.)

Representor ID and details: 5031/DP2 Dr Jayne Sara Hu	ınt						
Date Lodged Status Petition and No. Supporting Evidence 31/03/2012 M □ 0 □	Additional SA SEA		Rep format: Comment forn	· · · · · · · · · · · · · · · · · · ·		oe consiered by 'writter on of Public examination	n representations' or do on? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests - Consistency Tests -	P1 - Yes	P2 - Yes	et one or more test(s) of C3 - Yes	f soundness, pleaso		that it fails.
	Coherence and Effectiv			CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG9. MD12. MG2		oh Number: 52. 7.41. 7.44.	Proposal Map: MG9)	Constraints MapFeb 2012	Appendices: Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Yes	(1	f "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Yes	New Paragraph: Unanswered	Amended Paragrap Unanswered	<u>New Or Amen</u> Yes	ded Site: Other (see N Unanswered	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name: Land East		e Site? Yes	(If "Yes", plea	· ·	date Site Name and reference: Site reference	erence if known) MG 9 / ID 22 Appendix 1
3e - Please set out your representation below:							

The proposed Gypsy traveller site would be situated on a greenfield area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the Council's own report – Fordham report)

I do not support this unfair proposal, the Council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

1. The Sustainability Appraisal is flawed and contradictory — the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).

(ordered by Representation ID No.)

Representor ID and details: 5031/DP2 Dr Jayne Sara Hunt

2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;

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Representor ID and details: 5031/DP2 Dr Jayne Sara Hunt

- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site: and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and

(ordered by Representation ID No.)

Representor ID and details: 5031/DP2 Dr Jayne Sara Hunt

Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gyosy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

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Representor ID and details: 5031/DP2 Dr Jayne Sara Hunt

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

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Representor ID and details: 5031/DP2 Dr Jayne Sara Hunt

TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5032/DP1 Mr Stephen C Po	well		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		mments to be consiered by 'written representations' or do earing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered	oes not not meet one or more test(s) of sound P2 - Unanswered	Iness, please indicate which test(s) that it fails.
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswered	C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - U	Jnanswered CE2 - Yes CE3	- Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph N	Number: Proposal Map:	Constraints Map Appendices:
			(ticked)
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes	(If "No" or "Unanswered" - go t	o 3d)
3c - What changes would like to see made to the Deposit Plan?		lew Paragraph: Amended Paragraph: Ne Inanswered Yes Yes	ew Or Amended Site: Other (see Notes): Unanswered
	Notes:		
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Si Site Name: Leckwith Yard- Cardiff, Land at Le		e the Candidate Site Name and reference if known) Site Reference: 2551/CS1
3e - Please set out your representation below: We refer to the Leckwith Yard site adjacent the River Ely. approved planning proposals on this brownfield site that he that could support any potential SINC at this location.			correct. No reference has been made to previously ed or removed all evidence of Historic Woodlands or habitat
3f - Please outline the changes you wish to see made to the D We wish all reference to historic woodland and SINC to be	· ·		
4h - If you wish to speak please confirm which part of your ren	presentation you wish to speak to the inspector a	shout and why they consider it he necessary t	o speak at the hearing -

Representor ID and details:	5033/DP1 Mrs Crump							
Date Lodged Status Petition 02/04/2012 M	n and No. Supporting Evidence 0 ✓	Additional SA SEA		Rep format: Comment forn	· · · · · · · · · · · · · · · · · · ·	our comments to be a at a hearing session	•	representations' or do on? Written
2a - Do you consider the LDP is	Sound? Unsound	Procedural Tests -	ne Plan is unsound and P1 - Unanswered	P2 - Unans	wered			that it fails.
		Consistency Tests - Coherence and Effect	C1 - Unanswered iveness Tests - CE1		wered C3 - Unans CE2 - Unanswered	swered C4 - Una CE3 - Unanswered		
3a - Which part of the Deposit F	Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	n Number:	Proposal Map: MG2(26)	<u>C</u>	Constraints Map	Appendices:
3b - Do you wish to see any cha	anges made to the Deposit Plan	as a result of your rep	resentation? Yes	(l:	f "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to	see made to the Deposit Plan?	New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	oh: <u>New Or Amended</u> Yes	d Site: Other (see N Unanswered	
3d - If your representation relat	es to a new, deleted or amende	•	the site as a Candidate he West of Port Road,		(If "Yes", plea	ase give the Candidate Site Refere	e Site Name and ref nce: 2568/CS1	erence if known)
3e - Please set out your repres For my representation plea	entation below: ase see the Local Development	Plan objection docum	ent by Herbert.R.Thoma	as attached.	,			
3f - Please outline the changes For my representation plea	you wish to see made to the D ase see the Local Development	•	,	as attached.				
4b - If you wish to speak, pleas	e confirm which part of your rec	resentation vou wish t	o speak to the inspecto	r about and why th	nev consider it be nece	ssary to speak at the	hearing -	

Valo of Glamorgan Council - Local Dovolopment Plan, DEDOSIT PLAN (February 2012) - DEDDESENTATION DETAILS: (ordered by

Representor	ID and d	lotoilo	E02E/DI	P1 Mr & Mrs McClure	.						_ '
	Status			Supporting Evidence			Rep format: Comment form	•		s to be consiered by 'writte session of Public examinati	
2a - Do you c	onsider tl	he LDP	is Sound?	Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound a P1 - Unanswered		()	of soundness, p	please indicate which test(s) that it fails.
					Consistency Tests -	C1 - Unanswered	d C2 - Unansv	vered C3 - Una	answered C	24 - Unanswered	
					Coherence and Effect	iveness Tests - CE	1 - Unanswered	CE2 - Yes	CE3 - Unan	swered CE4 - Yes	
3a - Which pa	art of the	Deposit	Plan are yo	ou commenting on?	Policy Number:	Paragra	aph Number:	Proposal Map:		Constraints Map	Appendices:
					82			MG2(33)			
sh - Do you w	ish to se	e anv ch	nanges mag	de to the Deposit Plan	as a result of your rep	resentation? Yes	(If	"No" or "Unanswer	ed" - ao to 3d)		
-		•	•	e to the Deposit Plan?		Amended Policy: Unanswered	New Paragraph: Unanswered			Amended Site: Other (see Unanswere	
					Notes:						
3d - If your re	epresenta	ation rela	ates to a ne	w, deleted or amende	d site, did you submit Site Name: Land to t			(If "Yes", p	Ū	andidate Site Name and re Reference: 2378/CS.1	ference if known)
3e - Please s	set out yo	ur repre	sentation b	elow:							
I am wri the findi	ting to ex	press m e Candi	ny concerns date Site A	s about a proposed lar ssessment Process, a	nd development plan to and I am amazed that S irstly list them in point	St Nicholas has got p	ast stage 2 of the ass	essment process ne	ever mind stage	have read the Land Develo 3.	pment Plan Deposit a
	is a Gree		site. The as se Cross?	sessment process ain	ns to avoid Greenfield	sites if possible. By a	allowing this developm	ent in a Greenfield	site, will this ope	en the doors to further deve	lopments between St
St. Nich		s not ha	ve access t		rom a church, a small be within 800 metres			There is no doctor	s surgery, shops	s, or a public house within t	wo miles. According t
Environi		lonmen	t on a 2 30-	hectare site on the ed	dge of St. Nicholas, will	definitely have a ne	aative environmental i	impact on the anne	arance and the o	character of the village. The	firet huildings that w

be visible on approaching St. Nicholas from Cardiff would be a new housing estate. Considering St. Nicholas has around 150 houses, a development of 50 houses is substantially large and will not be in keeping with the surrounding village. St. Nicholas is an area of architectural and historical interest, which would be de-valued by this development.

The only access to this proposed development would be from the A48. St. Nicholas suffers access problems already at peak traffic times, never mind the additional congestion from a new housing estate. These access problems will in turn affect the rest of the Vale during peak traffic times.

Infrastructure Capacity

Increasing demand by 33% will place a huge strain on the infrastructure of St. Nicholas.

I can't see any. The atmosphere of this small village will be damaged forever as very few, if any, of its inhabitants are in favor of this proposed new development.

Deliverability

(ordered by Representation ID No.)

Representor ID and details: 5035/DP1 Mr & Mrs McClure

I am sure the current land over is only too keen to sell.

I will not go in to stage 3 assessments, as it is obvious that St. Nicholas would not pass stage 2 assessments.

Other general concerns are listed below:

Is there a need for affordable housing in St. Nicholas? Not according to the Local Housing Market Assessment of November 2010.

Is housing needed two miles away from Cardiff?

Surely housing is more needed in the heart of the Vale, not on the very outskirts. I have also noted that 200 houses are planned for the ITV Wales site at Culverhouse Cross, again on the very edge of the Vale. Is the St. Nicholas site needed when 200 houses are planned to be built on a re-usable site about 2 miles away which does offer the necessary facilities?

I would not normally write this type of letter but I feel a responsibility to the history of St. Nicholas, to air my grave concerns about these badly thought out plans.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5036/DP1 Mr Peter Dewey	
Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Yes C2 - Unanswered C3 - Unanswered C4 - Yes
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Yes Unanswered Unanswered Unanswered
	Notes:
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Land East St. Nicholas Site Reference: 1701/CS.4, 2378/CS.1, 2425/CS.1
3e - Please set out your representation below: I am writing to object to an element of the Local Developr	nent Plan ("LDP"), namely the in <mark>clu</mark> sion of the land adjacent to St Nicholas under ref MG 2 (33), housing allocations.
The reasons I consider the development of the land to be	inappropriate include:
50 Houses would be an increase in the size of the village The density of the development would be out of keeping of the tensity of the development would be out of keeping of the tensity of the development would be support such a support such as the tensity of the support suppor	vith existing residences; development and nothing planned to alter this situation;
3f - Please outline the changes you wish to see made to the D Removal of the land MG2 (33) from the LDP.	eposit Plan to make it sound (if relevant)
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5037/DP1 Mrs Elizabeth Hall	ту
Date Lodged Status Petition and No. Supporting Evidence 28/03/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Yes P2 - Yes
	Consistency Tests - C1 - Yes C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:
	82
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	 New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unan
	Notes: Removal of St. Nicholas from plan
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name: St. Nicholas Site Reference: MG2 (33)
3e - Please set out your representation below: I wish to strongly oppose the plan for development of site	no. MG2 (33) at St. Nicholas.
The site is a greenfield site on very good agricultural land percentage increase to the size of the existing village, thu	. It is a dense development completely out of character with this small conservation village. The number of dwellings proposed would mean a huge s putting increased pressure on our services.
There is no safe access to this site. I have witnessed mathevillage and at Culverhouse Cross.	ny casualties and fatalities over the years and people's safety is of paramount importance. The added volume of traffic would add to the congestion in
I am led to believe that surveys have indicated that there their buildings and regeneration of their area.	is no demand for social housing in this area. There is a complete lack of amenities in the village, and other urban area would benefit from renovation of
St. Nicholas is a village of historic and architectural intere	st. It would be a crying shame if it was vandalised in this way.
3f - Please outline the changes you wish to see made to the D Plan MG2 (33) removed from the local development plan.	
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5038/DP1 Ashle	ey Cox			
Date Lodged Status Petition and No. Support 29/03/2012 M □ 0	ing Evidence Additional SA SEA		u want your comments to be consiered by 'writte to speak at a hearing session of Public examinat	•
2a - Do you consider the LDP is Sound? Unansw	ered 2b - If you think that the Plan is unso Procedural Tests - P1 - Unans		est(s) of soundness, please indicate which test(s	s) that it fails.
	Consistency Tests - C1 - Unans	swered C2 - Unanswered C3	- Unanswered C4 - Unanswered	
	Coherence and Effectiveness Tests	- CE1 - Unanswered CE2 - Unansw	vered CE3 - Unanswered CE4 - Unansw	vered
3a - Which part of the Deposit Plan are you comm	enting on? Policy Number: F	aragraph Number: Proposal Map	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the	Deposit Plan as a result of your representation?	Unanswered (If "No" or "Unar	nswered" - go to 3d)	
3c - What changes would like to see made to the I	Deposit Plan? New Policy: Amended Policy: Unanswered Unanswered		Paragraph: New Or Amended Site: Other (see Unanswered Unanswere	
	Notes:			
3d - If your representation relates to a new, delete	ed or amended site, did you submit the site as a Ca Site Name:	andidate Site? Unanswered (If "Ye	es", please give the Candidate Site Name and re Site Reference:	eference if known)
3e - Please set out your representation below: I would like to express my support of the dec should be protected; we must preserve our e	ision to exclude the site at Brynhill Golf Club (site nvironment for future generations. I hope with all r	reference no. 2407/CS) from future develony heart that the Council will do the right the	opment. Green field and leisure sites in Barry an hing and stand up against proposed housing dev	d the Vale of Glamorgan velopment on such sites.
3f - Please outline the changes you wish to see m	ade to the Deposit Plan to make it sound (if releva	ant)		
4b - If you wish to speak, please confirm which pa	art of your representation you wish to speak to the	inspector about and why they consider it b	be necessary to speak at the hearing -	

Representor ID and details: 5038/DP2	Ashley Cox						
Date LodgedStatusPetition and No.Support02/04/2012M0	pporting Evidence Additional s	SA SEA	Rep format: Comment form	, ,	our comments to be a at a hearing session	•	representations' or do on? Written
2a - Do you consider the LDP is Sound? Sound?	und 2b - If you th Procedural T	nk that the Plan is unsound an ests - P1 - Unanswered	d does not not meet P2 - Unansw	` '	soundness, please ir	ndicate which test(s)	that it fails.
	Consistency	Tests - C1 - Unanswered	C2 - Unansw	vered C3 - Unans	swered C4 - Una	answered	
	Coherence a	nd Effectiveness Tests - CE1	l - Unanswered (CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	red
3a - Which part of the Deposit Plan are you co	ommenting on? Policy Numb	er: Paragrar	oh Number: I	Proposal Map:	<u>C</u>	Constraints Map	Appendices:
3b - Do you wish to see any changes made to	the Deposit Plan as a result of	your representation? No	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to	the Deposit Plan? New Policy	Amended Policy:	New Paragraph:	Amended Paragrap	oh: New Or Amended	d Site: Other (see N	lotes):
	Unanswere	d Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	
	Notes:						
3d - If your representation relates to a new, d	•	u submit the site as a Candidat Brynhill Golf Club	e Site? Yes	(If "Yes", plea	ase give the Candidate Site Refere	e Site Name and refe nce: 2407/CS1	erence if known)
3e - Please set out your representation below I wish to show my support for the Depos particularly encouraging. I believe it is we	it L.D.P. approved by the coun						
3f - Please outline the changes you wish to s	ee made to the Deposit Plan to	make it sound (if relevant)					
4b - If you wish to speak, please confirm which	ch part of your representation y	ou wish to speak to the inspect	or about and why the	ey consider it be neces	ssary to speak at the	hearing -	

Representor	ID and d	letails:	5039/D	P1 Mr David Owen (L	ead name of Petition	Submission)					
Date Lodged 02/04/2012	Status M	<u>Petiti</u>	on and No. 17	Supporting Evidence	Additional SA SEA		Rep format: Letter	,	your comments to be co	•	n representations' or do on?
2a - Do you co	onsider tl	ne LDP	is Sound?		2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	does not not mee P2 - Unans	()	f soundness, please inc	dicate which test(s) that it fails.
					Consistency Tests -	C1 - Unanswered	C2 - Unans	swered C3 - Unans	swered C4 - Unar	nswered	
					Coherence and Effect	tiveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswe	ered
3a - Which pa	rt of the	Deposit	t Plan are y	ou commenting on?	Policy Number:	<u>Paragraph</u>	Number:	Proposal Map:	Co	onstraints Map	Appendices:
					MG2(16)						
3b - Do you w	ish to se	e any c	hanges ma	de to the Deposit Plan	as a result of your rep	oresentation? Unansw	vered (I	f "No" or "Unanswered	l" - go to 3d)		
3c - What cha	nges wo	uld like	to see mad	de to the Deposit Plan?	New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragray Unanswered	ph: New Or Amended Unanswered	Site: Other (see Unanswere	
					Notes:						
3d - If your re	presenta	ation rel	ates to a ne	ew, deleted or amende	d site, did you submit Site Name:	the site as a Candidate	Site? Unanswe	red (If "Yes", plea	ase give the Candidate Site Referen		ference if known)
3e - Please s I AGREE	-				BE BUILT ON AT AL	L FOR REASONS IN RI	EP FORM DP-449	997E			
3f - Please ou	utline the	change	es you wish	to see made to the De	eposit Plan to make it	sound (if relevant)					
4b - If you wis	sh to spe	ak, ple	ase confirm	which part of your rep	resentation you wish	to speak to the inspector	about and why th	ney consider it be nece	ssary to speak at the h	earing -	

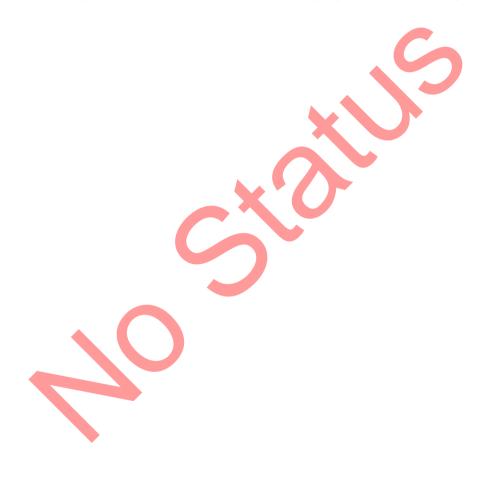
Representor ID and details: 5040/DP1 Ray Thomas, Sutt	on Newydd Farm						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0			Lilian	you want to speak at	r comments to be cons a hearing session of F	ublic examination	
	2b - If you think that the Pla	n is unsound and do Unanswered Unanswered	es not not meet one P2 - Unanswere C2 - Unanswere	e or more test(s) of so ed ed C3 - Unanswe		ate which test(s) t	
, , , , , , , , , , , , , , , , , , ,	Policy Number: MG9. MG2(30)	Paragraph N	umber: Pro	posal Map:		traints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan		tation? Unanswere	ed (If "No	o" or "Unanswered" -	go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Am	ended Policy: Ne	w Paragraph:		New Or Amended Sit Unanswered		
3e - Please set out your representation below:	Site Name:		e: Unanswered	(ii res , piease	give the Candidate Site Reference:		
Policy MG9 Paragraph 6.49, MG9 - Gypsy and Traveller S							
This should be taken out of the LDP because it is not soul An application 2011/00710/FUL was refused October 201 countryside		table and unjustified	form of Urban Deve	elopment in this count	ryside location contra t	o Policies ENV 1	-Development in the
ENV 2 -Agricultural Land Supplementary Guidance on des	sign in the landscape and su	stainable developme	ent ; and National G	Suidance in Planning F	Policy Wales.		
The Bonvilston site was unsustainable not only on the reliance with no pavements to facilities approx 1.5 Km away.	ance on Private Transport be	ut also on accessibili	ty of services in the	e community, including	g Health and Education	. These being acc	cessed via a country
The site at Llangan is very similar to Bonvilston:- Accesse capacity now. The nearest school would be Colwinston an	d along narrow country lane d the nearest health service	s with no footpaths, r s would be in Cowbri	no local services ind dge 7 Km away.	cluding health and ed	ucation. Even though L	langan Primary S	chool is nearby it is at
Therefore this proposed Gypsy and Traveller site at Llang	an should be taken out of the	e LDP.					
I did not want to put forward an alternative but I do think w have not visited the site.	e should look at the Hayes I	Road site which belor	ngs to the Council a	and is already occupio	ed by Travellers. I cann	ot comment on th	ne facilities there as I
Policy MG2- Housing Alloocations -							
The Garden Emporium Fferm Goch.							
The conditions affecting the Travellers site also come into There is no regular bus service, not close to shops and m 40 houses could generate 60 children (1.5 children/house This would be an over-development of the site. The outline	edical facilities (Cowbridge and as stated previously the	e school is already a					

(ordered by Representation ID No.)

Representor ID and details: 5040/DP1 Ray Thomas, Sutton Newydd Farm

I would be prepared to speak on both issues at a Hearing Session during Public Examination if required.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

Date Lodged Status Petition and No. Supporting Evidence	Additional SA SEA	Rep format:	, ,	our comments to be consiered by 'written representations' or				
02/04/2012 M 🔲 0		Email	you want to speak	you want to speak at a hearing session of Public examination?				
a - Do you consider the LDP is Sound? Unanswered	•	is unsound and does not not me Unanswered P2 - Unar	` '	soundness, please indicate which testi	s) that it fails.			
	Consistency Tests - C1 -	Unanswered C2 - Unar	nswered C3 - Unansv	wered C4 - Unanswered				
	Coherence and Effectiveness	s Tests - CE1 - Unanswered	CE2 - Unanswered	CE3 - Unanswered CE4 - Unanswered	wered			
a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG20. SP7	Paragraph Number:	Proposal Map:	Constraints Map	Appendices:			
b - Do you wish to see any changes made to the Deposit Plan	as a result of your representa	ation? Unanswered	(If "No" or "Unanswered"	- go to 3d)				
c - What changes would like to see made to the Deposit Plan?		nded Policy: New Paragraph nswered Unanswered	Amended Paragraph Unanswered	h: New Or Amended Site: Other (see Unanswered Unanswere				
	Notes:							
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site Site Name:	as a Candidate Site? Unansw	ered (If "Yes", pleas	se give the Candidate Site Name and r Site Reference:	eference if known)			
3e - Please set out your representation below:								

OBJECTIONS TO POLICY SP 7 - TRANSPORTATION AND TO POLICY MG 20 - TRANSPORT PROPOSALS

OBJECTION A: The Policies exclude provision for a Llysworney By-pass

Policy background

Provision for a Llysworney By-pass is included in Policy TRAN 2 of the Vale of Glamorgan UDP, which was adopted as recently as 2004. The supporting text for Policy TRAN 2 says: "the scheme is important to relieve environmental and safety problems caused by a significant number of heavy lorry movements through the village. At present, the lorries use the B4270, which runs through the village of Llysworney, as it provides a major access route to the A48 for businesses located on the industrial estates".

Page 40 of the Vale of Glamorgan Local Transport Plan Annual Progress Report 2005 (which is the most recent one) says:

"The Council's support for highway schemes in the LTP including by-passes around the villages of Llysworney, Gileston and Boverton, remains. However, notwithstanding the feasibility work that has been undertaken for a new Airport Access Road, grant funding for these new road schemes has not received WAG support through the Transport Grant process".

The Llysworney scheme was still included in para 7.110 of the Vale of Glamorgan Local Transport Plan, which ran to 2006. But it isn't in the SEWTA RTP Capital Programme to 2015 and has been superseded in priority in Policy SP 7 of the LDP Written Statement by 5 other transport schemes.

Accordingly, despite the By-pass scheme having been recognised in development plan policy for some 30 years, it has suddenly disappeared from the new LDP apparently without written explanation. The verbal explanation provided by the Planning Officer is that the other transport schemes identified in Policy SP 7 have higher priority and that there is no reasonable prospect of gaining public funding for the Llysworney scheme in the foreseeable future.

Identified need for the By-pass scheme

The current problems experienced in the village are summarised on page 10 of the 'Llysworney Conservation Area Appraisal and Management Plan' 2010 as follows:

(ordered by Representation ID No.)

Representor ID and details: 5041/DP1 Mr John Homfray

"Because of its location on a busy traffic route, and despite a 30 mph speed limit, the top part of the village is blighted by fast moving traffic. Vehicular movement to the south is also constrained by the narrowness of the road as it leads up the hill towards Llantwit Major, which in places only allows a single vehicle to pass".

In 2008, during the course of the preparation of the Conservation Area Appraisal, a questionnaire was delivered to all the properties in Llysworney and two of the main problems identified by local residents were volume and speed of traffic travelling through the village and damage to hedges and erosion of verges by large vehicles.

In their evidence to the UDP Inquiry in 1998, the Llysworney Community Association presented an excellent case in support of the need for the By-pass. Since that time, traffic congestion has continued to increase and the RAC foundation estimates that traffic volumes are set to increase in the UK by 43% to 2035. In addition to the problems which the local residents experience in the village, there are also serious capacity (peak am & pm) and safety problems at the Pentre Meyrick junction on the A48, which also provides access to the Ruthin Road (the main link to the M4 in this part of the rural Vale).

The Planning Inspector who reported on the objections to the UDP in November 2000 supported the need for a new road link between the A48 and the B4270. In that case, a new link road (as part of the Darren Farm housing scheme) was being proposed as an alternative to the Llysworney By-pass but he identified the following benefits which would have been the same as those for a by-pass:

Allowing a weight restriction ban to be imposed for the village of Llysworney, thereby removing extraneous heavy goods traffic and relieving the environmental and safety problems caused by the significant number of heavy lorry movements through the village

Allow a significant proportion of the extraneous car traffic to choose to re-route away from the village

As explained in para C7.1.11 of the Inspector's report, the link road would not have offered all the same benefits as a by-pass or "a complete solution to the traffic problems in Llysworney (and) it would provide only limited relief to Cowbridge". In para C7.12 he alluded to the difficulties in finding public funding for the By-pass but in para C.1.16 concluded that the link road would have produced substantial environmental benefits for Cowbridge and Llysworney.

I refer to the Inspector's conclusions and recommendations (on Highways & Traffic) for Appeal Ref. APP/Z6950/A/02/1096305 & APP/Z6950/A/03/1108352 – 145 dwellings on land between the A48 and Llantwit Major Road (Darren Farm) January 2004 (see below Appendix A). His conclusions on a By-pass (or link road further to the east which was to be funded by the housing scheme) may be summarised as follows:

Para 12.31 – the main benefit of a By-pass would be to remove all through traffic from Llysworney and maintain the direct route to the A48 and M4 from the south

The diversion of HGV and other traffic away from Llysworney, which is a Conservation Area, would undoubtedly be a significant improvement for the local environment and amenity, given the proposed expansion of the Llandow business area under UDP policy. Although he qualified this by saying that the link road would not have had the same benefits as a By-pass in reducing non-HGV traffic through the village

The link road would have reduced westbound traffic in the pm peak on Cowbridge High Street by up to 25% (with an overall reduction in 2-way flows of 4% in the morning and 11% in the evening). And I believe there is no reason why a By-pass should not have a similar beneficial effect (see section 4 below)

In respect of eastbound traffic, there would be a small improvement by diverting traffic way from the B4270 passing through the built-up area of Cowbridge and the Crossways junction (which has very restricted visibility – see para 12.39). And I believe that this improvement could be enhanced by signage at Nash corner and other traffic control measures to discourage traffic using the B4270 as a through route (see section 4 below)

Economic reasons to include provision for a Llysworney By-pass in Policy SP 7 & MG 20

Para 3.21 of the LDP says that it will seek to provide a policy framework which improves and enhances key transport links to and within the Vale for the benefit of residents, visitors and business. The B4270 through the village of Llysworney and the Ruthin Road from Pentre Meyrick to Pencoed provide the key transport link for the western Vale to the M4 at junction 35. Despite the problems identified above, there is no provision in the LDP to address these

More than 22ha of employment land was allocated in the UDP on the Vale Business Park and Llandow Trading Estate but empirical evidence shows that there has been only limited success in trying to attract new firms. This is confirmed by the findings of the Council's own Employment Land Study, which attributes part of the problem to poor access

Policy MG 24 (4) of the LDP identifies land to the south of Ruthin Quarry as a long-term limestone reserve (approx 30m tonnes). Although the quarry is inactive at present, the limestone reserve is of high quality and has been used in the past to supply Aberthaw Cement works and is likely to do so in the future. One of the main constraints on the viability of the operation was the additional cost of re-routeing lorries carrying the stone via the B4265, so as to avoid travelling through Llysworney Village.

Not only did this have environmental implications for residents along that route (in Ewenny, St Brides & Wick) it also increased significantly the carbon foot-print of the operation because of the additional

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Representor ID and details: 5041/DP1 Mr John Homfray

transport mileage. Accordingly, the provision of the By-pass is likely to be of benefit to both the local guarrying industry and to Lafarge at Aberthaw, which is one of the single largest employers in the Vale

An up-graded B4270/Ruthin Road link to the M4 would enhance considerably the potential for the allocations identified by Policy MG 12 (2) & (3) to be realised

Funding & Design of the By-pass scheme

Even in 1998, the Llysworney Community Association concluded that the only practicable option for the provision of the Llysworney By-pass lay in a privately-funded scheme, and that remains the case today. The consortium of builders promoting the new settlement on Candidate Site 182/CS.4 at Llandow Airfield have undertaken to provide the By-pass and implement related highway improvements if they were able to develop approx 2.750 units.

Some of the environmental, congestion and safety benefits that would accrue from the new By-pass have been described above but there would be other benefits as well and these could be augmented by additional measures:

The sub-standard junction at Pentre Meyrick Cross on the A48 has serious congestion problems (particularly pm week-days) and a poor accident record. These problems would be addressed by the construction of a new roundabout in this location; together with improvements at Nash Corner and to other sections of the B4270 & B4268 routes - funded as part of Llandow Newydd

An HGV weight restriction (bus & access only) could be placed on the B4270 route between Nash Manor and Cowbridge to improve the amenity of residents along the route; and alleviate congestion and junction geometry problems at the Llantwit Road/Westgate Street junction in Cowbridge

There is also a serious access problem associated with Llwynhelig Farm in Cowbridge, which could be ameliorated by the construction of a Llysworney By-pass. This is an industrial-scale farm containing both food and green-waste composting plants, and which is the main composting facility for this type of waste in the Vale of Glamorgan; as well as processing waste from further afield.

At present, the only access for agricultural and composting HGV's is via the sub-standard entrance off the A4222 route adjacent to Llwynhelig House. The farm wishes to replace this with direct access off a new roundabout on the A48, located at the western end of the Cowbridge By-pass (where the dual carriageway ends). It cannot be achieved at present, because a new roundabout here would also create ingress for west-bound traffic (doubling-back eastwards on the A48) to get into western Cowbridge to avoid the congested Eastgate and Cowbridge High Street; but also using the shorter B4270 route through the built-up area of Cowbridge to get to Llandow and Llantwit Major (avoiding Llysworney). Accordingly, under present circumstances, a new roundabout on the A48 would undoubtedly have the undesirable implication of transferring much of the HGV and other traffic that currently uses the B4268 through Llysworney onto the B4270, to the detriment of residents living along that route.

A comprehensive traffic management scheme associated with the construction of the Llysworney By-pass would enable these problems to be resolved. Providing a new access to Llwynhelig Farm; re-directing through traffic away from the congested centre of Cowbridge; and improving the environment of those living along the B4270 route between Cowbridge and Nash Manor.

This will be the subject of more detailed evidence and explanation in support of Candidate Site 182/CS.4 at the 'Alternative Sites' stage of the LDP.

OBJECTION B: The Policies exclude provision for a new railway station at Gileston to serve the allocation identified by Policy MG 12 (3).

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

OBJECTION A: The Policies exclude provision for a Llysworney By-pass

OBJECTION B: The Policies exclude provision for a new railway station at Gileston to serve the allocation identified by Policy MG 12 (3).

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor	ID and d	letails:	5042/DF	Ceri-Lynne Tee											
Date Lodged 29/03/2012	Status M	Petitio	n and No. 73	Supporting Evidence	Additional SA SEA				Rep format: Comment for			your comments to k at a hearing sess			presentations' or do Written
2a - Do you consider the LDP is Sound? Unsound			2b - If you think that the Procedural Tests - Consistency Tests -	P1 -	Yes		does not not mee	et one	or more test(s) o	of soundness, pleas		e which test(s) th	at it fails.		
					Coherence and Effect					CE2	- Yes	CE3 - Unanswei		E4 - Unanswere	d
3a - Which pa	rt of the I	Deposit I	Plan are yo	9	Policy Number: 49			agraph I	Number:	alloc	,		Constra	aints Map	Appendices: Other - Not Listed
3b - Do you w	ish to see	e any ch	anges mad	de to the Deposit Plan	as a result of your rep	resenta	ation? Y	es		If "No"	or "Unanswered	d" - go to 3d)			
3c - What cha	inges wo	uld like t	o see mad	e to the Deposit Plan?	New Policy: Unanswered Notes:	Ame Yes	nded Polic		New Paragraph: Unanswered	_	mended Paragra	<u>ph:</u> <u>New Or Amer</u> Yes	ded Site:	Other (see Not Unanswered	es):
3d - If your re	epresenta	ation rela	tes to a ne	w, deleted or amende	d site, did you submit Site Name: The Gard					7	(If "Yes", ple	ase give the Candi Site Ref		Name and refere D30 in the draft I	,
3e - Please s	et out vo	ur renre	sentation h	elow.											

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE. FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) - in particular for 42 and (after revisions) 24 houses - havebeen considered and rejected by the Council in the past. The issues that led to those rejections in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant - have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built - we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be livework units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.
- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 300/0 - edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15

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people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Our representations in relation to each of the tests of 'soundness' are as follows:

TEST PI - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' (strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full.
- 2. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for

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this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers).

This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans ... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. "Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant - the local primary school (Llangan primary school) and highways issues:

Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i. e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a s 1 06 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils.

Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary school~ (it did not specify any in particular) to accommodate the children from 12 houses- 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road - with the primary access to serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times - many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian cycleway to Llangan primary school from Fferm Goch Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans: ...

• the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility

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- the capacity of existing and potential infrastructure including public transport ... and social infrastructure (such as schools ...), to absorb further development and the cost of adding further infrastructure ... "
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3.5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180,000 and No.8 has been on the market for £185,000.

Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.

If 40 houses are built on the Garden Emporium site this will be significant overdevelopment of this site at a density which should not be permitted in this location. The following points are relevant:

- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 ofPPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6. If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

a) a condition (condition 9) that a significant proportion of the site (approx. 30% - being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all

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properties shall be located at least 10 metres from this boundary within the development site; and

b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The report says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site - which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone - a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4.6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (wSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because

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there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST C5 - The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" - The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." - The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" - The proposed development of the Garden Emporium site represents overdevelopment of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

(ordered by Representation ID No.)

Representor ID and details: 5042/DP1 Ceri-Lynne Tee

TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full '3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

- f) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",
- g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.

(ordered by Representation ID No.)

Representor ID and details: 5042/DP1 Ceri-Lynne Tee

- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. '-

In relation to point 1, above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - a) Section 5.11 (page 26)- delete Fferm Goch from the list of Minor Rural Settlements.
 - b) Policy MG2 (page 74)- amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12.
 - c) Residential allocations table (page 145)- amend number of dwellings at The Garden Emporium, Fferm Goch from 40 to 12
 - d) Proposals map- amend to exclude back area of site MG2(30) identified as habitat management area edged green on attached plan
 - e) Housing Supply Background Paper (November 2011)- error in table 1 site no.30 The Garden Emporium, Fferm Goch number of units should be 12, not 220.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5043/DP1 Mr Robert Ryder							
Date Lodged Status Petition and No. Supporting Evidence 17/03/2012 M □ 0 □	Additional SA SEA		Rep format: Email	, ,	your comments to be co c at a hearing session c	•	•
2a - Do you consider the LDP is Sound? Unanswered	2b - If you think that the Procedural Tests -	e Plan is unsound and de P1 - Unanswered	loes not not meet P2 - Unansv	` '	f soundness, please inc	dicate which test(s)	that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansv	vered C3 - Unans	swered C4 - Unar	nswered	
	Coherence and Effective	veness Tests - CE1 - l	Jnanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Unanswei	red
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph N	Number:	Proposal Map:	Co	onstraints Map	Appendices:
	MG2(28)						
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repr	esentation? Unanswe	red (If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered		New Paragraph: Unanswered	Amended Paragray Unanswered	ph: New Or Amended Unanswered	Site: Other (see N Unanswered	otes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name:	ne site as a Candidate S	ite? Unanswere	ed (If "Yes", plea	ase give the Candidate Site Referen		erence if known)
3e - Please set out your representation below:							
I wish to make the following comments as part of the Con village, which I have always understood is situated in a Col I also believe that the primary road access from the proposour drive onto the road (which is really no more than a lan entering and leaving the village. The proposed development	onservation Area. used site to the A48 is u e) are very poor. I belie	nsuitable for the size of t ve that some of our neig	the proposed developments	elopment. I live in one lar difficulties. One ha	e of a row of houses leads to exercise extreme of	ading into the village care when entering	e. The sight lines from
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it s	ound (if relevant)					
4b. If you wish to speak please confirm which part of your rar	vrocontation you wish to	cook to the increator	about and why the	ov consider it he nece	ccaru to cnook at the h	oorina	

Representor ID and details: 5044/DP1 Clifford Parish	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered
	Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:
	29
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan	New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes):
	Unanswered Yes Unanswered Unanswered Unanswered Unanswered
	Notes:
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Atlantic Trading Estate and Hayes Wood. Site Reference:
3e - Please set out your representation below:	
It is necessary for the future Waste Management strategy other Candidate Sites for future waste management use.	that there is a range of waste management facilities within the Deposit Plan and that the existing Waste licensed Hayes Road HWRC be added to the
	raste recycling reprocessing (in partnership with Caerphilly CBC, Blaenau Gwent CBC, Merthyr Tydfil CBC and Monmouthshire CC, it is critical that the se in order to protect the ability to use it as a potential Transfer Station for bulk recycling for transfer to reprocessing plants outside the Vale of
The former HWRC facility at Hayes Road is an ideal local for the purpose of bulking up recycling and haulage to out	ion for this future need, not only being still covered by an existing Waste Management Licence, but having the site infrastructure in place to allow its use side Vale locations.
This need as been identified by the Council's Cabinet (minimentified as a site for transfer of municipal recyclate.	n no C1662 refers) recommends that the former Civic Amenity Site at Hayes Road, Sully be agreed subject to planning and modifies waste licence be
	eposit Plan to make it sound (if relevant) IWRC at Hayes Road Sully and that this site is added to the other sites identified for future waste management activities with the Deposit Plan amended ste management use only and particularly the use of a future 'Transfer Station' needed to comply with the Council's future reprocessing procurement.
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Page 3135 of 3187

Representor ID and det	tails: 5046/D	P1 Persimmon Hom	es (Wales) Ltd, c/o Ag	ent					
Date Lodged Status 02/04/2012 M	Petition and No.	Supporting Evidence	Additional SA SEA		Rep format: Comment form	•	,	be consiered by 'writte sion of Public examinat	n representations' or do ion? Examination
a - Do you consider the	LDP is Sound?	Sound	2b - If you think that t Procedural Tests - Consistency Tests -	P1 - Unanswered	d does not not meet o P2 - Unansw C2 - Unansw	rered		se indicate which test(s) that it fails.
				tiveness Tests - CE1		CE2 - Unanswered	CE3 - Unanswe	ered CE4 - Unansw	ered
a - Which part of the De	eposit Plan are y	ou commenting on?	Policy Number: Delivery and Implement	· · · · · · · · · · · · · · · · · · ·	<u>oh Number: </u>	Proposal Map:)	Constraints Map	Appendices:
b - Do you wish to see a	any changes ma	de to the Deposit Plar		presentation? No		No" or "Unanswere			
c - What changes would	d like to see mad	le to the Deposit Plan		Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragra Unanswered	ph: New Or Ame Unanswered	nded Site: Other (see Unanswere	
3d - If your representation	on relates to a ne	ew, deleted or amende		the site as a Candidate	e Site? No	(If "Yes", ple	· ·	lidate Site Name and re	ference if known)
Be - Please set out your DELIVERY	representation l	pelow:							
Page: 129									
Section 8 – Deliver	y and Implemen	tation							
1.0 Introduction									
1.1 Persimmon Hor	mes objects to th	ne proposed phased d	elivery of Housing Allo	ocation MG2[14] – Plasi	newydd Farm, Llantw	vit Major within Phas	e 2 – 2016 to 2021	l.	
1.2 In this context in	t is considered th	nat the Delivery and Ir	nplementation Table 2	- Residential Allocatio	ns is contrary to the t	following test of sour	idness:		
 CE4 in that prioriti allocations. 	ising brownfield	over greenfield allocat	ion sites for early deve	elopment during the pla	n period limits the lev	vel of flexibility to allo	w early developm	ent within settlements v	vith only greenfield
2.0 Amplification									
								nis approach to the phasticularly within Llantwit M	
				ne "phasing of developr ard early or be phased			Should the individ	dual circumstances rela	ting to particular
2.3 Therefore in co	nsidering the ab	ove if it can be shown	that allocated sites are	e capable of developme	ent at an earlier phas	e it should not be re	stricted to only bro	wnfield sites within Pha	se 1 – 2011 to 2016.
								of the site in the contex	

(ordered by Representation ID No.)

Representor ID and details: 5046/DP1 Persimmon Homes (Wales) Ltd, c/o Agent

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - 3.0 Required Change
 - 3.1 That given the assessment of the allocated housing site. Plasnewydd Farm (MG2[14]) within the supporting Development Framework Document, and the indication within paragraph 8.5 of the Deposit Plan that delivery can be brought forward the Delivery and Implementation Table 2 - Residential Allocations should be amended to identify delivery in Phase 1 - 2011 to 2016

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -To provide continued support



Representor ID and details: 5046/DP2 Persimmon Home	s (Wales) Ltd, c/o Agent	
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 ✓	Commer	4a - do you want your comments to be consiered by 'written representations' or do t form you want to speak at a hearing session of Public examination? Examination
2a - Do you consider the LDP is Sound? Sound	Procedural Tests - P1 - Unanswered P2 - U	t meet one or more test(s) of soundness, please indicate which test(s) that it fails. Jnanswered
	Consistency Tests - C1 - Unanswered C2 - Unanswered C2 - Unanswered C2 - Unanswered C5 - Unans	Jnanswered C3 - Unanswered C4 - Unanswered d CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: LDP Strategy	Proposal Map: Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan		(If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: New Paragr Unanswered Unanswered Unanswere Notes:	
3d - If your representation relates to a new, deleted or amende		(If "Yes", please give the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: THE STRATEGY Page: 23		
Section 5: LDP Strategy		
1.0 Introduction		
1.1 Persimmon Homes support the LDP Strategy as state	d at Paragraph 5.3.	
2.0 Amplification		
2.1 Whilst broad support is provided for the overall LDP S "other sustainable settlements to accommodate further he achieving this element of the Strategy.		settlements, Persimmon Homes highlight particular support for the key element relating to the role which Llantwit Major has in
impact on their existing character and local environment.	ndeed, additional development in these locations will not o	ufficient population, services and facilities to assimilate growth without it having a detrimental only help to sustain existing services and facilities but will also provide opportunities for further ne Vale of Glamorgan over the Plan period." (para 5.13 refers).
		ithin separate representations relating to Section 5 – Settlement Hierarchy. The representation the Local Authority's own assessments as well as Planning Policy Wales.
3f - Please outline the changes you wish to see made to the D None	eposit Plan to make it sound (if relevant)	
4b - If you wish to speak, please confirm which part of your rep To provide continued support	resentation you wish to speak to the inspector about and	why they consider it be necessary to speak at the hearing -

Representor ID and details: 5046/DP3 Persimmon Hom	es (Wales) Ltd, c/o Agent				
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0	Additional SA SEA	Rep format: Comment for	4a - do you want you m you want to speak at	r comments to be consiered by 'writter a hearing session of Public examinati	n representations' or do on? Examination
2a - Do you consider the LDP is Sound? Sound		vered P2 - Unan vered C2 - Unan CE1 - Unanswered	swered C3 - Unanswered CE2 - Unanswered C	oundness, please indicate which test(s ered C4 - Unanswered CE3 - Unanswered CE4 - Unanswe	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Pa	ragraph Number:	Proposal Map:	Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation?	No ((If "No" or "Unanswered" -	go to 3d)	
3c - What changes would like to see made to the Deposit Plan			Amended Paragraph: Unanswered	New Or Amended Site: Other (see I Unanswered Unanswered	
3d - If your representation relates to a new, deleted or amended and a set out your representation below:	ed site, did you submit the site as a Ca Site Name:	ndidate Site? No	(If "Yes", please	give the Candidate Site Name and re Site Reference:	ference if known)
3e - Please set out your representation below: RESIDENTIAL REQUIREMENT					
Page: 37					
Policy SP3 – Residential Requirement					
1.0 Introduction					
1.1 Persimmon Homes support the identified residential I	equirement of 9,950 new dwellings over	r the Deposit Plan period	d as per Policy SP3.		
2.0 Amplification					
2.1 We note that the housing requirement uses the Wels which states that "The latest Assembly Government loca	Government 2008 based Local Authorauthority level Household Projections	rity Household Projection or Wales should form th	ns and the latest Mid-Year ne starting point for assessi	Estimates. This is in accordance with ng housing requirements" (paragraph	Planning Policy Wales 9.2.2 refers).
2.2 However, concerns are raised within response to Poli under provision of flexibility (as detailed with separate sul	cy MG1 - Housing Supply in the Vale comissions).	Glamorgan in relation to	o the over reliance on wind	fall sites in providing the residential re	quirement as well as the
3f - Please outline the changes you wish to see made to the D None	eposit Plan to make it sound (if relevan	t)			
4b - If you wish to speak, please confirm which part of your re To provide continued support	oresentation you wish to speak to the in	spector about and why	they consider it be necessa	ary to speak at the hearing -	

Representor ID and details: 5046/DP4 Persimmon Homes (Wales) Ltd, c/o Agent
Date Lodged 02/04/2012 Status 02/04/2012 Petition and No. 02/04/2012 Supporting Evidence 02/04/2012 Additional SA SEA 05/04/2012 Rep format: 05/04/2012 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?
2a - Do you consider the LDP is Sound? Sound 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered C64 - Unanswered C64 - Unanswered
3a - Which part of the Deposit Plan are you commenting on? Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? No (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered
3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Site Reference:
3e - Please set out your representation below: THE STRATEGY
Page: 34
Policy SP1 – The Strategy
1.0 Introduction
1.1 Persimmon Homes support Policy SP1 – The Strategy as it relates to the identified role of Llantwit Major and Housing Allocation MG2[14] – Plasnewydd Farm, Llantwit Major.
2.0 Amplification
2.1 Overall Persimmon Homes support the intention of the Strategy to improve the living and working environment as well as managing the environment by achieving the following criteria:
 Providing a range and choice of housing to meet the needs of all sectors of the community; Promoting a range of employment sites intended to meet the needs of the Vale of Glamorgan and the wider capital region; Reinforcing the role of Barry, Service Centre Settlements and Primary Settlements as providers of cultural, commercial and community services; Promoting sustainable transport; Protecting and enhancing the built, natural and coastal environment and Promoting opportunities for sustainable tourism and recreation.
2.2 It is outlined below as to how both Llantwit Major, and in particular Housing Allocation MG 2[14] – Plasnewydd Farm, accord with the relevant criteria and seek to support the strategy. 2.3 Firstly, the allocation of Plasnewydd Farm for residential development will provide important family housing within Llantwit Major, for which there is an identified need. Within the Authority's Sustainability Appraisal Assessment it is clearly noted that the sites development would have a positive impact through improving access to housing and securing an appropriate affordable housing provision within the coastal housing market area which has an identified need.

(ordered by Representation ID No.)

Representor ID and details: 5046/DP4 Persimmon Homes (Wales) Ltd, c/o Agent

2.4 Whilst Llantwit Major and the allocated site at Plasnewydd Farm do not directly provide employment land, consideration should be given to the proximity to St Athan Strategic Opportunity Area (as identified under Policy SP2 and Policy MG 4) which is to provide a mixed use scheme, including the development of 89 hectares of employment land. Llantwit Major clearly has a functional relationship with St. Athan by virtue of its proximity.

- 2.5 Furthermore, according to the Sustainable Settlements Appraisal Review Background Paper (November 2011), Llantwit Major scores 3 out of 4 for rail services, and is within the top five settlements in the Vale in terms of access to rail services. The Background Paper also scored Llantwit Major a maximum 4 out of 4 for bus services. The clear provision of public transport highlights that the resident population of Llantwit Major have access to a number of other locations and settlement and employment opportunities.
- 2.6 As evidenced in separate submissions relating to Section 5 of the Development Plan and the Settlement Hierarchy support is given to the identification of Llantwit Major as a Service Centre Settlement. The allocation at Plasnewydd Farm contributes towards the role and function of the Service Centre Settlement in focusing future growth in a sustainable location and which can benefit cultural, commercial and community services.
- 2.7 The Housing allocation at Plasnewydd Farm is considered to be very well located in relation to every day services, with the majority of local facilities within walking distance of the site. In particular Llantwit Major Railway Station, which can be conveniently accessed on foot by bicycle or by private car, offers excellent opportunities for sustainable commuting.
- 2.8 With regard to protecting and enhancing the built and natural environment Llantwit Major has a designated Conservation Area which contains a number of Listed Buildings and Scheduled Monuments. This consideration has a bearing upon how future development can be located within Llantwit Major. The supporting Development Framework Document confirms that the allocation at Plasnewydd Farm is not subject to any designated elements of the historic environment, including Listed Building or Scheduled Monuments. Moreover, the site would be largely screened from the Conservation Area by the Vale of Glamorgan Railway Line.
- 2.9 Finally, whilst the allocation at Plasnewydd Farm does not directly promote opportunities for sustainable tourism and recreation it is important to note that neither does it provide any detriment to their future provision within Llantwit Major.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

 None
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing To provide continued support

Representor ID and details: 5046/DP5 Persimmon Home	s (Wales) Ltd, c/o Agent		
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0			comments to be consiered by 'written representations' or do hearing session of Public examination? Examination
•	2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered		
	Consistency Tests - C1 - Unanswered	C2 - Unanswered C3 - Unanswere	d C4 - Unanswered
	Coherence and Effectiveness Tests - CE1 - U		3 - Unanswered CE4 - Unanswered
	Policy Number: Paragraph N 49		Constraints Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? No	(If "No" or "Unanswered" - go	to 3d)
3c - What changes would like to see made to the Deposit Plan?	New Policy: Amended Policy: Ne	ew Paragraph: Amended Paragraph: 1	New Or Amended Site: Other (see Notes): Unanswered Unanswered
3d - If your representation relates to a new, deleted or amended	d site, did you submit the site as a Candidate Sit Site Name:	te? No (If "Yes", please g	ve the Candidate Site Name and reference if known) Site Reference:
3e - Please set out your representation below: HOUSING ALLOCATION Page: 73			
Policy MG 2 – Housing Allocation			
1.0 Introduction			
1.1 Persimmon Homes supports the inclusion of Plasnewy	dd Farm, Llantwit Major as a residential allocation	on within Policy MG2 [14] – Housing Alloca	itions.
2.0 Compliance with Deposit LDP			
2.1 The site at Plasnewydd Farm has been subject to the 3 physical constraints and finally a Sustainability Appraisal to Furthers details of the process and methodology are provided.	determine how the site performed against each	h of the Sustainability Objectives of the Vale	gy within the Deposit Plan, assessment of environmental and e of Glamorgan LDP Sustainability Appraisal Framework. per 2011).
2.2 Following this detailed assessment by the Authority the site's suitability further its compliance with the policy of the			for housing under Policy MG2 [14]. In order to illustrate the
Role and Function	*		
2.3 Llantwit Major's role and function are outlined in further important role and function of Llantwit Major, reflected by it within the Plan that Service Centre Settlements "serve the these settlements will also act as focal points for growth in	ts status as a Service Centre Settlement, accord daily needs of their local residents and also act	ds with the Deposit Plan's growth strategy. It as important hubs for those living in nearby	
2.4 The allocation of Plasnewydd Farm for housing suppor Hierarchy.	ts the identified role and function of Llantwit Maj	jor as a Service Centre Settlement and assi	sts in locating growth in accordance with the Settlement
			Dogo 2141 of 219

(ordered by Representation ID No.)

Representor ID and details: 5046/DP5 Persimmon Homes (Wales) Ltd. c/o Agent

Strategy

- 2.5 As detailed in a separate submission relating to the Local Development Plan Strategy (Paragraph 5.3) and in reference to the role and function as above, it is evident that the allocation at Plasnewydd Farm, Llantwit Major accords with
- a key element of the Strategy that, "other sustainable settlements [are] to accommodate further housing and associated development".
- 2.6 Specific reference to Llantwit Major is made within the Deposit Plan as a sustainable settlement as they are "considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment. Indeed, additional development in these locations will not only help to sustain existing services and facilities but will also provide opportunities for further enhancement" (Para 5.10 refers).
- 2.7 Further assessment of the accordance with relevant policy relating to the Local Development Plan Strategy is provided within separate submissions made to Policy SP1 The Strategy. Within the submission it is evident that both the allocation at Plasnewydd Farm (MG2[14]) and the settlement of LLantwit Major accord with the relevant criteria and provide a positive contribution toward the strategy.

Housing Requirement

2.8 As detailed within the separate submissions made in relation to Strategic Policy SP3 – Residential Requirement and Policy MG1 – Housing Supply Housing it is noted that there is general agreement that the provision of 9,950 new dwellings is acceptable. The inclusion of Plasnewydd Farm, Llantwit Major as a housing allocation for around 120 dwellings is supported as actively assisting in providing residential development in places which people want to live, however the reliance upon 3,049 dwellings from windfall and small sites is an unreasonable amount to rely upon within the supply. It is also notes that whilst a flexibility allowance for non implementation is important, given the concerns above relating to windfall and small sites there ought to be consideration of a non implementation allowance of 20%. It is therefore necessary to provide other chains of supply in order to reach the required 9,950 new dwellings.

Phasing & Delivery

- 2.9 Within separate submissions made in relation to Section 8 Delivery and Implementation we have identified that the housing allocation site at Plasnewydd Farm (MG2[14]) is capable of being brought forward to Phase 1 2011 to 2016. The supporting Development Framework Document, as detailed below, provides an assessment of the site in the context of its allocation and outlines that there is no constraint to early development and deliverability.
- 2.10 Furthermore, whilst the principles for the use of brownfield and committed allocation sites to be brought forward first are understood it should also be noted that it has the ability to unnecessarily restrict development throughout the Vale of Glamorgan, particularly within Llantwit Major, which has neither.
- 3.0 Sustainability Appraisal Assessment
- 3.1 As detailed above a Site Sustainability Assessment has been undertaken by the Local Authority and confirms that the site is subject to evenly dispersed sustainability scores and has positives impacts of delivering a range of housing types as well as the potential to support the enhancement of existing community facilities.
- 4.0 Development Framework Document
- 4.1 A Development Framework Document to support the site at Plasnewydd Farm, Llantwit Major as a housing allocation site, under Policy MG2 [14] has been prepared.
- 4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines Persimmon Homes' proposed development concept which responds to the assessments carried out and identifies the principles for a high quality development that contributes to meeting the housing need through the Development Plan period within the sustainable settlement and Service Centre. Llantwit Maior.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

 None
 - 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing To provide continued support

(ordered by Representation ID No.)

Representor	ID and c	letails:	5046/D	P6 Persimmon Home	es (Wales) Ltd, c/o Age	ent								
Date Lodged	<u>Status</u>	<u>Petiti</u>	on and No.	Supporting Evidence	Additional SA SEA			Rep format:				representations' or do		
02/04/2012	М		0	✓	\checkmark			Comment forr	n you want to spea	o speak at a hearing session of Public examination? Exami				
2a - Do you co	onsider t	ne LDP	is Sound?		2b - If you think that the Procedural Tests -		unsound and Unanswered		et one or more test(s) of swered	of soundness, please	indicate which test(s)	that it fails.		
					Consistency Tests -	C1 - l	Unanswered	C2 - Unans	swered C3 - Unan	nswered C4 - U	nanswered			
					Coherence and Effect	tiveness 1	Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswere	d CE4 - Yes			
3a - Which pa	rt of the	Deposit	Plan are y	ou commenting on?	Policy Number:		<u>Paragrapl</u>	n Number:	Proposal Map:		Constraints Map	Appendices:		
					48									
3b - Do you w	ish to se	e any cl	hanges ma	de to the Deposit Plan	as a result of your rep	resentatio	on? Yes	(1	If "No" or "Unanswered	d" - go to 3d)				
3c - What cha	nges wo	uld like	to see mad	le to the Deposit Plan?	New Policy:	Amend	led Policy:	New Paragraph:	Amended Paragra	aph: New Or Amend	led Site: Other (see N	Notes):		
					Unanswered	Yes		Unanswered	Unanswered	Yes	Unanswered	İ		
					Notes:									
3d - If your re	presenta	ation rel	ates to a ne	ew, deleted or amende	d site, did you submit t Site Name: Wick Roa		_	Site? Yes	(If "Yes", ple	ease give the Candid Site Refe	ate Site Name and ref	erence if known)		
3e - Please s	et out vo	ur repre	esentation b	pelow:										

Page: 71

Policy MG1 – Housing Supply in the Vale of Glamorgan

- 1.0 Introduction
- 1.1 Persimmon Homes support the requirement identified within Policy SP3 for 9,950 new dwellings to be built between 2011-2026 (as set out in separate representations). We note that the consequent provision is made for 10,945 new dwellings under Policy MG1. However, we object to the over reliance on the development of unallocated windfall and small sites within the housing supply. Objections are also raised to the phased release of allocated housing and in particular the priority given to brownfield and committed site, as it unnecessarily restricts the level of housing provision on sites which are deemed deliverable where otherwise there would be no new housing until the later phases of the plan.
- 1.2 In this context it is considered that the Policy is contrary to the following test of soundness:
- CE4 in that the over reliance on unallocated windfall and small sites as part of the housing supply does not provide a reasonable level of flexibility required to meet the housing requirement. Also in prioritising brownfield over greenfield allocation sites for early development during the plan period limits the level of flexibility to allow early development within settlements with only greenfield allocations.
- 2.0 Amplification Windfall Supply
- 2.1 Although it is generally agreed that an element of windfall and small site provision is likely during the plan period it is considered that even with a proposed 25% 3,049 dwellings is still an unreasonable amount to rely upon within the supply and would note that such a reliance is unsound for the following reasons.
- 2.2 There are a number of significant problems with such an approach. Windfall and small sites are finite in supply and do not provide an assured supply of housing land.
- 2.3 Rather it would be more beneficial to identify further allocations and provide certainty over delivery and supply within the plan period.
- 2.4 Whilst it is not considered that the full 3.049 dwellings should be allocated, certainly a proportion of the figure can be redistributed to new housing allocations. In this regard Persimmon Homes draws the Authority's attention to the availability of land to the South of Housing Allocation MG2[14] - Plasnewydd Farm at Wick Road, Llantwit Major.

(ordered by Representation ID No.)

Representor ID and details: 5046/DP6 Persimmon Homes (Wales) Ltd, c/o Agent

- 2.5 Furthermore, in reviewing the Housing Supply Background Paper (November 2011) we note at Table 3: Large Windfall Site Contribution Trends 2011-2010, that there are 1 or 2 years in which the historic number of dwellings provided through windfall sites far exceed the average. For example in 2008 a total of 601 dwellings were provided through windfall sites. However in 2009 and 2010 the opposite has occurred and only 44 and 37 dwellings were provided respectively.
- 2.6 With regard to small sites Table 4: Small Sites Contribution Past Completions 2001-2010 illustrates that the number of dwellings provided has fallen away over the last few years, with a 10 year low of 23 in 2010.
- 2.7 In removing the exceptionally large number of dwellings (601 dwellings) from the windfall and small site supply the provision drops to 3,385 dwellings, and with a 25% reduction provides 2,539 dwellings over the plan period.
- 2.8 Whilst this is obviously lower it is still considered an unreasonable amount to rely upon within the supply and further highlights the acceptability of the allocation of additional housing sites, including Wick Road, Llantwit Major.

Flexibility Allowance

2.9 An element of flexibility in the housing land supply is a fundamental component of any housing land supply estimate to reflect the fact that not all sites with planning permission or allocated in the Plan will be developed either in whole or in part within the Plan period. Planning permissions may lapse and sites may be developed for alternative purposes. Such an allowance for non implementation is important, and whilst the Deposit Local Development Plan currently provides a flexibility allowance of 10% through the proposed reserve sites it is considered that given the concerns above relating to windfall and small sites there ought to be consideration of a non implementation allowance of 20% and that new housing allocations should be provided. In this regard we highlight the acceptability of Wick Road, Llantwit Major as an additional housing allocation.

Phasing

- 2.10 Turning to the phasing of sites we do not support the restrictive nature of affording priority to brownfield and committed allocated sites within 5 year periods. This is outlined in separate submissions to Section 8 Delivery and Implementation.
- 2.11 The priority for brownfield and committed sites to be developed in the first instance causes a lack of flexibility in delivering housing, particularly within Llantwit Major which has no brownfield or committed allocated development though it is identified as a Service Centre Settlement and a location in which future growth should be directed. The concern is raised in the fact that the allocated site at Plasnewydd Farm (MG2[14]) is prevented from coming forward earlier that the anticipated 2016-2021.
- 2.12 Furthermore, the supporting Development Framework Document for the allocated site at Plasnewydd Farm illustrates the acceptability of the development of the allocation and the commitment for an early development of the site. It therefore should be brought into the first 5 year phasing period 2011-2016 as allowed under paragraph 8.5 of the Deposit Plan (refer to separate submissions to Section 8 Delivery and Implementation).
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - 3.1 In light of the significant reliance on windfall and small sites to provide the residential requirement and to make the Deposit Plan sound it is considered necessary to identify further housing allocations to provide certainty over delivery and supply within the plan period. This is further reinforced through the need to increase the flexibility allowance to 20%.
 - 3.2 In this regard particular attention is drawn to the availability of further land within Llantwit Major for a housing allocation site. The land at Wick Road (as defined within the support Development Framework Document) has the ability to provide approximately an additional 100 houses in total.
 - 3.3 Also given the assessment of the allocated housing site, Plasnewydd Farm (MG2[14]) within its supporting Development Framework Document, it is evident that the site can be brought forward for delivery in Phase 1 2011 to 2016. With regard to the proposed Wick Road housing allocation it is proposed that the site will be developed within Phase 2 2016 to 2021.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing Due to the nature of the representation on the attached sheets

(ordered by Representation ID No.)

Representor ID and details: 5046/DP7 Persimmon Home	es (Wales) Ltd, c/o Ager	t					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 ✓	Additional SA SEA		Rep format: Comment form		r comments to be consider a hearing session of Pu	•	•
2a - Do you consider the LDP is Sound? Sound	Procedural Tests -	P1 - Unanswered	P2 - Unans	t one or more test(s) of so wered C3 - Unanswe			nat it fails.
	Coherence and Effective	reness Tests - CE1	- Unanswered	CE2 - Unanswered C	CE3 - Unanswered C	CE4 - Unanswere	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Settlement Hierarchy.	<u>Paragraph</u> 5.11		Proposal Map:	<u>Constr</u>	aints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your repre	esentation? No	(If	"No" or "Unanswered" -	go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragraph: Unanswered	New Or Amended Site Unanswered	Other (see No Unanswered	t <u>es):</u>
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	e site as a Candidate	Site? No	(If "Yes", please	give the Candidate Site Site Reference:	Name and refer	ence if known)
3e - Please set out your representation below:				-			

LDP SETTLEMENT HIERARCHY Page: 26 Paragraph 5.11

- 1.0 Introduction
- 1.1 Persimmon Homes support the LDP Settlement Hierarchy and Growth Strategy as set out in paragraph 5.11 in particular the inclusion of Llantwit Major as a Service Centre Settlement.
- 2.0 Amplification

Settlement Role and Function

- 2.1 As indicated within paragraph 5.11 the settlements within the Vale of Glamorgan have been grouped according to their size, role and characteristics. Consequently Llantwit Major has been identified as one of three Service Centre Settlements (Cowbridge and Penarth being the others) which sit below the Key Settlement of Barry and above the Primary and Minor Rural Settlements in the hierarchy.
- 2.2 Persimmon Homes support the classification of Llantwit Major as a Service Centre Settlement and the recognition, at paragraph 5.13, that Llantwit Major has "significant resident populations, good public transport provision, local employment opportunities, established town centres and a wide range of cultural, educational and community services and facilities".
- 2.3 Support is also provided for the role of Llantwit Major as a Service Centre Settlement to "serve the daily needs of their local residents and also act as important hubs for those living in nearby smaller settlements". It is right that "the Strategy envisages that these settlements will also act as focal points for growth in the Vale of Glamorgan over the Plan period".
- 2.4 The role and function of Llantwit Major as a Service Centre Settlement is further evidenced by the Council's Sustainable Settlements Appraisal Review Background Paper (November 2011). Having undertaken an audit of the services and facilities at settlements to identify those which are potentially suitable to accommodate additional development in terms of their location, role and function the research concludes that Llantwit Major is ranked 3rd in the most sustainable settlements with only Barry and Penarth above it, highlighting the settlement's sustainability credentials.

Planning Policy Wales

2.5 As well as the Authorities own assessment of Llantwit Major as a Service Centre Settlement, as detailed above, we further note the Criteria for Sustainable Settlements as detailed within Section 4.6 of

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(ordered by Representation ID No.)

Representor ID and details: 5046/DP7 Persimmon Homes (Wales) Ltd, c/o Agent

Planning Policy Wales (PPW) (Fourth edition, 2011). Paragraph 4.6.2 outlines that "development plans need to provide a framework to stimulate, guide and manage change towards sustainability" and that local planning authorities should:

- "Promote sustainable patterns of development, identifying previously developed land and buildings, and indicating locations for higher density development at transport hubs and interchanges and close to route corridors where accessibility by walking, cycling 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 existinginfrastructure; and
- Ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location" (paragraph 4.6.2 refers).
- 2.6 Having regard to the Local Authority's assessment and criteria of PPW it is evident that the LDP Settlement Hierarchy and Growth Strategy accords with the above and supports Llantwit Major as a Service Centre Settlement and its acceptability as a sustainable location to accommodate future growth.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

 None
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 5047/DP1 Mr Isaac Benjuya						
Date LodgedStatusPetition and No.Supporting Evidence27/03/2012M0	Additional SA SEA		Rep format: Letter		comments to be consiered a hearing session of Public	ed by 'written representations' or do ic examination?
2a - Do you consider the LDP is Sound? Unanswered	,		does not not meet o P2 - Unanswe	` '	undness, please indicate	which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unanswe	ered C3 - Unanswer	red C4 - Unanswere	ed
	Coherence and Effective	reness Tests - CE1 -	Unanswered C	E2 - Unanswered CI	E3 - Unanswered CE	4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: MG2(19). MG2(20)	<u>Paragraph</u>		roposal Map:	<u>Constrain</u>	nts Map Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	esentation? Unanswe	ered (If "N	No" or "Unanswered" - g	o to 3d)	
3c - What changes would like to see made to the Deposit Plan?	New Policy: Unanswered Notes:		New Paragraph: Unanswered		New Or Amended Site: Unanswered	Other (see Notes): Unanswered
3d - If your representation relates to a new, deleted or amende	ed site, did you submit th Site Name:	e site as a Candidate S	Site? Unanswered	(If "Yes", please	give the Candidate Site N Site Reference:	lame and reference if known)

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times,. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

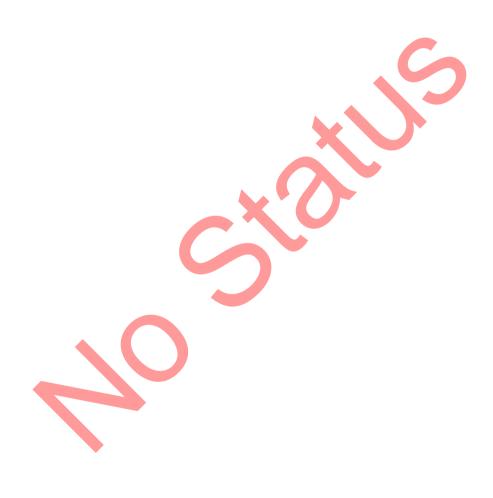
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 5047/DP1 Mr Isaac Benjuya

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

Representor ID and details: 5049/DP1	Mrs G A Smith						
Date Lodged Status Petition and No. Sur 29/03/2012 M 0	pporting Evidence Additional SA	<u>SEA</u>	Rep format: Letter		comments to be consient a hearing session of Pub	red by 'written representations' or do olic examination?	
2a - Do you consider the LDP is Sound? Una	•	that the Plan is unsound and ts - P1 - Unanswered	does not not meet o	` '	undness, please indicate	which test(s) that it fails.	
	Consistency Te	sts - C1 - Unanswered	C2 - Unanswe	ered C3 - Unanswe	red C4 - Unanswer	ed	-
	Coherence and	Effectiveness Tests - CE1	- Unanswered C	E2 - Unanswered C	E3 - Unanswered CE	E4 - Unanswered	-
3a - Which part of the Deposit Plan are you co	ommenting on? Policy Number: MG2(19). MG2			Proposal Map:	<u>Constra</u>	aints Map Appendices:	
3b - Do you wish to see any changes made to	the Deposit Plan as a result of yo	our representation? Unansv	vered (If "I	No" or "Unanswered" - g	go to 3d)		
3c - What changes would like to see made to	the Deposit Plan? New Policy: Unanswered Notes:	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragraph: Unanswered	New Or Amended Site: Unanswered	Other (see Notes): Unanswered	
3d - If your representation relates to a new, d	deleted or amended site, did you s Site Name:	ubmit the site as a Candidate	Site? Unanswered	d (If "Yes", please	give the Candidate Site I Site Reference:	Name and reference if known)	

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

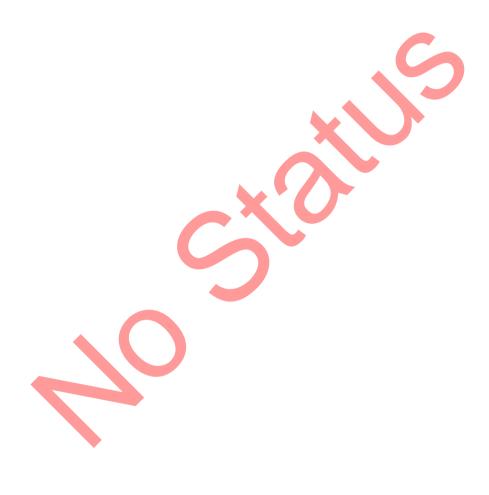
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 5049/DP1 Mrs G A Smith

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



Representor ID and details: 5050/DP1 Mr and Mrs P F	ulgoni						
Date Lodged Status Petition and No. Supporting Evident 02/04/2012 M □ 0 ✓	ce Additional SA SEA		Rep format: Comment for	· · · · · · · · · · · · · · · · · · ·		o be consiered by 'writte ssion of Public examina	en representations' or do tion? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	I does not not mee P2 - Unan	` '	f soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unan	swered C3 - Unan	swered C4	- Unanswered	
	Coherence and Effec	tiveness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unansw	vered CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:		Constraints Map	Appendices:
	75			MG2(26)			
3b - Do you wish to see any changes made to the Deposit Pl	an as a result of your rep	oresentation? Yes	(If "No" or "Unanswered	" - go to 3d)		
3c - What changes would like to see made to the Deposit Pla	an? New Policy:	Amended Policy:	New Paragraph:	Amended Paragra	ph: New Or Am	ended Site: Other (see	Notes):
	Unanswered	Unanswered	Unanswered	Unanswered	Yes	Unanswere	ed
	Notes:						
3d - If your representation relates to a new, deleted or amer		the site as a Candidate		(If "Yes", plea	Ü	didate Site Name and reeference: 2568/CS1	eference if known)
3e - Please set out your representation below: For my representation please see the Local Development	ent Plan objection docum	nent by He <mark>rbe</mark> rt.R.Thom	as attached.				
3f - Please outline the changes you wish to see made to the For my representation please see the Local Developme	•	,	as attached.				
4b - If you wish to speak, please confirm which part of your	representation you wish	to speak to the inspecto	or about and why t	hev consider it be nece	ssarv to speak a	t the hearing -	

Representor ID and details: 5051/DP1 Richard Hawkins						
Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0	Additional SA SEA		Rep format: Comment form	,	nments to be consiered by 'writte earing session of Public examinat	•
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that t Procedural Tests -	he Plan is unsound and P1 - Unanswered	does not not meet o	` '	ness, please indicate which test(s	s) that it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	ered C3 - Unanswered	C4 - Unanswered	
	Coherence and Effect	tiveness Tests - CE1	- Unanswered C	CE2 - Yes CE3 -	Unanswered CE4 - Unansw	ered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	<u>Number:</u> P	Proposal Map:	Constraints Map	Appendices:
	MG2(13)					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your re	oresentation? Yes	(If "	No" or "Unanswered" - go to	o 3d)	
3c - What changes would like to see made to the Deposit Plan	? <u>New Policy:</u> Unanswered		New Paragraph: Unanswered	Amended Paragraph: New Yes		
	Notes:					
3d - If your representation relates to a new, deleted or amende	•	the site as a Candidate west of St Athan Rd Llar		` ''	the Candidate Site Name and re Site Reference: 2446/CS1 24	,
3e - Please set out your representation below:						
3f - Please outline the changes you wish to see made to the D Have candidate site removed and include as a green wed	•		ons.			
4b - If you wish to speak, please confirm which part of your re	oresentation you wish	to speak to the inspector	r about and why the	y consider it be necessary to	speak at the hearing -	

Representor ID and details: 5054/DP1 Mr Martyn Jones							
Date Lodged Status Petition and No. Supporting Evidence 16/03/2012 M □ 0 □	Additional SA SEA		Rep format: Eform			o be consiered by 'writter ssion of Public examination	
2a - Do you consider the LDP is Sound? Sound	2b - If you think that the Procedural Tests -	ne Plan is unsound and P1 - No	does not not me P2 - No	et one or more test(s) o	f soundness, ple	ase indicate which test(s)) that it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4 -	· No	
	Coherence and Effect	iveness Tests - CE1	- No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragrap</u>	h Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? No	((If "No" or "Unanswered	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy: No	Amended Policy: No	New Paragraph: No	Amended Paragra No	New Or Am	ended Site: Other (see N	Notes):
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Candidate	Site? No	(If "Yes", ple	J	didate Site Name and ref	erence if known)
3e - Please set out your representation below: candidate number 2407/CSI							
I support the current LDP in their decision to exclude Bryr	nhill from the Developm	ent plan. My reasons a	ire:				
1) Development would have negative impact on a designary. 2) There would be destruction of open space used for leis 3) there would be inferior road infrastructure. 4) There would be safety concerns in the local community. 5) There would be a negative impact on ecological / envir	sure purposes. y, namely schools, hosp						
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it s	sound (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to	o speak to the inspecto	r about and why	they consider it be nece	essary to speak a	t the hearing -	

Representor ID and details: 5055/DP1 L.Gershenson							
Date Lodged Status Petition and No. Supporting Evidence 16/03/2012 M 0	ee Additional SA SEA		Rep format: Eform	, ,		to be consiered by 'written ssion of Public examinati	n representations' or do ion? Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the	ne Plan is unsound		et one or more test(s) of	f soundness, ple	ase indicate which test(s) that it fails.
	Procedural Tests -	P1 - No	P2 - No				
	Consistency Tests -	C1 - Yes	C2 - No	C3 - No	C4	- No	
	Coherence and Effect	tiveness Tests - (CE1 - No	CE2 - No	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Parag	graph Number:	Proposal Map:		Constraints Map	Appendices:
				MG2			
3b - Do you wish to see any changes made to the Deposit Pla	n as a result of your rep	resentation? Ye	s (I	If "No" or "Unanswered	l" - go to 3d)		
3c - What changes would like to see made to the Deposit Pla	n? New Policy:	Amended Policy	: New Paragraph:	Amended Paragra	ph: New Or Am	ended Site: Other (see I	<u>Notes):</u>
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amend	ded site, did you submit	the site as a Candi	date Site? No	(If "Yes", plea	ū	ndidate Site Name and re reference:	ference if known)
3e - Please set out your representation below:				,			
I wish to object to the proposed housing development si	tes on Port Road, Barry.						
The sites will add to the congestion already present on a l do not feel improvements to the Five Mile Lane would More traffic on the road would add to the noise pollution. The proposed sites would entail loss of green field while One of the sites contain important woodlands. The sites are outside of the recognised boundary of Bar	rectify the increased con and traffic pollution alrea brownfield sites remain	ady endured by the		ong the road.			
3f - Please outline the changes you wish to see made to the Alternative sites that do not impact on already congeste		`	he airport to reduce co	ongestion are reinstated	l.		
4b - If you wish to speak, please confirm which part of your r	epresentation you wish t	o speak to the insp	ector about and why t	hey consider it be nece	ssary to speak a	at the hearing -	

(ordered by Representation ID No.)

Representor ID and details: 5056/DP1 Mr & Mrs J.Lewis							
Date Lodged Status Petition and No. Supporting Evidence 18/03/2012 M 0	Additional SA SEA		Rep format: Eform		•	o be consiered by 'writte ssion of Public examinati	n representations' or do ion? Do not speak at he
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -		d and does not not me P2 - No	eet one or more test(s) o	of soundness, ple	ase indicate which test(s) that it fails.
	Consistency Tests -	C1 - Yes	C2 - Yes	C3 - No	C4	- No	
	Coherence and Effect	iveness Tests -	CE1 - No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Para</u>	graph Number:	Proposal Map:		Constraints Map	Appendices:
	MG2(15)			MG2 Housing	Allocation		
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your rep	resentation? Ye	 es	(If "No" or "Unanswere	d" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan	? New Policy:	Amended Policy	<u>y: New Paragraph:</u>	Amended Paragra	aph: New Or Am	ended Site: Other (see	Notes):
	No	No	No	No	Yes	No	
	Notes:						
3d - If your representation relates to a new, deleted or amende	ed site, did you submit t Site Name:	the site as a Cand	lidate Site? No	(If "Yes", ple	· ·	didate Site Name and re	ference if known)

3e - Please set out your representation below:

Housing Requirement:

Policy MG1 states that the housing requirement is for 9,950 dwellings in the plan period, with priority being given to brownfield and committed sites. Proposing reserve housing site MG2[15] is of great concern, as it is a Greenfield site and its proposed allocation as a potential reserve housing site is clearly inconsistent with the council's strategy. The additional potential dwellings (345) are not required to meet the housing requirement figure based on the Welsh Government Population projections for the Vale of Glamorgan during the plan period. Any contigences or reserve housing sites should be based on brownfield sites, sites with extant planning permission, small sites, windfall sites, allocations within the adopted UDP, rather than on Greenfield sites which is also contrary to national policy.

Settlement boundary:

The existing settlement boundary along Heol-y-Felin / Nant-yr-Adar, Llantwit Major, as defined in the adopted UDP (refer to proposals map) should not be amended and should be retained. Para 4.1.5 of the adopted UDP recognises that "Llantwit Major has accommodated a great deal of new housing development and therefore the UDP does not allocate any further land for residential use as it is considered that this would adversely affect the setting and character and would be contrary to the aims and objectives of Planning Policy Wales".

Amending the settlement boundary to allow for reserve housing development to the south of Llantwit Major will allow for an unacceptable intrusion into the rural landscape which is contrary to para 4.4.65 of the adopted UDP which states, "New housing outside the defined settlement boundary often creates unacceptable intrusions into the rural landscape. New dwellings in the countryside also can place an unacceptable burden on local services". Any new housing in this location MG2[15] would place an unacceptable burden on existing local services.

For the countryside to remain undeveloped and its attractive appearance protected, new residential development outside the current defined UDP settlement boundary must not be permitted as a precedent will be set for future residential development which will have adverse impact on the character and environment of the area adjacent to Hodnant Brook.

Glamorgan Heritage Coast:

The proposed reserve housing site forms part of the Glamorgan Heritage Coast as defined in the adopted UDP. The site should be retained as heritage coast to be preserved and enhanced. It should be allocated under Policy MG27 in the Draft Local Plan. Paragraph 7.104 states, "the designation of the Glamorgan Heritage Coast recognises its national importance as an area of attractive undeveloped coastline. The objective of the designation is to ensure that the special character and natural beauty of the coastline are protected and improved while enabling and enhancing its enjoyment and facilitating its continued use for agriculture and other established and appropriate economic activities."

The adopted UDP states "the special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced"..... "the area will be treated as a remote zone with priority being given to

(ordered by Representation ID No.)

Representor ID and details: 5056/DP1 Mr & Mrs J.Lewis

agriculture, landscape and nature conservation." (Policy ENV5). Para 3.4.15 says "the designation of the Glamorgan Heritage Coast recognises its national importance as an area of attractive undeveloped coastline. The objective of the designation is to ensure that the undeveloped character of the coastline is conserved and to enable the provision of appropriate recreational facilities". The proposed allocation of site MG2[15] is therefore contrary to adopted policy ENV5.

Planning Policy Wales 2002 requires the LPA to consider the environment in the widest sense in plan preparation and to assess the likely environmental impact of the proposal on the natural environment (para 5.1.1).

The proposal is also contrary to Para 3.4.16 of the adopted UDP which states, "strong pressure for new development, especially residential development, exists".... "However, the undeveloped unspoilt nature of the coastline is fundamental to the Glamorgan Heritage Coast. If the sense of isolation and natural scenery is to be retained it is considered important to strictly control new development." The Council recognise that the site is elevated and any potential development would be "inland looking in parts". The proposed allocation MG2[15] is agricultural land any proposal to develop would have an unacceptable adverse visual impact on the landscape quality of the Glamorgan Heritage Coast. PPW similarly places emphasis on the importance of retaining agricultural land. Proposed site MG2[15] should therefore be deleted from the emerging Local Plan.

Open Space and Nature Conservation:

Open spaces with significant amenity value should be protected from development. The area adjacent to Hodnant Brook is rich in nature conservation and there is evidence of protected species, including badgers and bats, which are frequently seen by residents of Heol-y-Felin. The site has been used informally for recreational purposes by the existing local community since the Heol-y-Felin estate was built in the 1970s. A full biodiversity assessment is required in order to appreciate the rich diversity of the existing landscape and habitat of this area. Proposed allocation of this site would encroach upon the habitat of protected species.

National Policy:

National Planning Policy set out in Planning Policy Wales emphasises the importance of re-using Brownfield sites in order to minimise the take up of Greenfield sites. Also that any proposed residential development has access to a range of services. The degree of impact on the environmental character and appearance of the area, biodiversity and other environmental assets/resources needs to be fully assessed. The Council accepts that this is still required and therefore the site MG2[15] has been proposed prematurely. The extent of any physical constraints and impact on existing infrastructure such as water supply, drainage and sewer capacities need more detailed assessment and should be deleted from the emerging Local Plan. Emphasis for future residential development should be allocated on brownfield sites and within established settlement boundaries and should not be allocated on sites outside adopted UDP settlement boundaries, or on Greenfield sites, in advance of further consideration being given to sites likely to be identified as having potential for future residential development as part of the current consultation exercise of the Deposit Local Plan.

Supporting Background Documents:

Site MG2[15] lies within a Landscape Character Area (LCA 7) which is one of the key background documents to support the deposit Local Plan. There is key policy and management issues relating to this site as defined in the document. The proposed allocation of MG2[15] as a reserve housing site is therefore contrary to the Deposit Local Plan Supporting Documents Background Paper, in which the site is designated Heritage Coast Hinterland (Landscape Character Area 7), as defined by the Vale of Glamorgan Designation of Special Landscape Areas, Final Report, August 2008. This LCA designation also reflects the site's designation within the adopted UDP. Open Space Background Paper, November 2011 states typology of open spaces included in TAN16 details that coastal land should be considered as a component of the natural and semi-natural greenspace available within an area and the CCW guide makes reference to contribution that the coast and in particular urban coast can make to quality of life and natural experience. The proposed allocation of site MG2[15] is contrary to this policy.

Llantwit Major is deficient in provision of open space (refer to Table 6, p26)

- -15.55ha (provision including common land)
- -16.51ha (provision excluding common land)

Natural and semi-natural greenspace provides a number of benefits to an area in which they are located. They make an important contribution to the quality of the environment and to quality of life in urban areas and are valued by the existing local community and provide important refuges for wildlife. This reflects the council's strategic context (para 10.2.4. page 23). Allocation of MG2[15] is contrary to this. The visual contribution of the open space and the natural conservation of the area adjacent to Hodnant Brook, in addition to the area's amenity value must be taken into account in ensuring the area remains outside of the settlement boundary and is protected from inappropriate development, especially residential, which would have a adverse visual affect on the well established views from the existing residential properties Heoly-Felin and Nant-yr-Adar.

Candidate Site:			

(ordered by Representation ID No.)

Representor ID and details: 5056/DP1 Mr & Mrs J.Lewis

The site has been put forward as a result of the Candidate Site consultation exercise undertaken between 4 December 2006 and 31 January 2007. The willingness of the owner to release the site for development has taken presidence over the views of the existing local Heol-y-Felin / Nant-yr-Adar community.

The role of planning has changed since the candidate site exercise was undertaken and the current government now places greater emphasis on the important role of the community in planning. The Localism Act 2011 encourages Local Planning Authorities to work more closely with local communities. This Act passes significant new rights direct to communities and individuals, making it easier for them to get things done and achieve their ambitions for the place where they live. The candidate site consultation exercise was undertaken at a time when "planning did not give members of the public enough influence over decisions that make a big difference to their lives".... "Power was exercised by people who were not directly affected by the decisions they were taking. This meant, understandably, that people often resented what they saw as decisions and plans being foisted on them". (Localism Act 2011), The Localism Act contains provisions to make the planning system clearer, more democratic, and more effective. As Site MG2[15] was put as a result of the candidate site consultation it should not be included within the Deposit Local Plan, as the current Government thinks that local communities should have genuine opportunities to influence the future of the places where they live, rather than leaving people feeling 'done to' and imposed upon, which is the very opposite of the sense of participation and involvement.

Deletion of proposed allocation MG2[15]:

The Constraints Map shows part of the site to lie within Flood Zone C2. The settlement boundary to the south of Llantwit Major has been amended to allow for the proposed allocation of this reserve housing site prematurely. There are too many unknown factors and the existing local established community of Heol-y-Felin/Nant-yr-Adar would experience a worsening of their environment and quality of life. The potential implications of the proposed development on nature conservation, biodiversity, loss of amenity and open space, adverse affect on the amenity and character of the existing environment of the residential area of Heol-y-Felin and Nant-yr-Adar, by virtue of noise, additional traffic and visual intrusion. The likely impact on community facilities: utility services; C2 flood zone; potential archaeology; local highway network and landscape are all unknown. There is little doubt that the proposal would place pressure on the existing local road network, specifically the Heol-y-Felin estate, but also Ham Lane East and existing community facilities.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) Delete site MG2[15] - Land to the rear of Heol-v-Felin Estate. Llantwit Major

Allocate site MG2[15] as Heritage Coast (Policy MG27)

Amend settlement boundary to the south of Llantwit Major to follow Heol-y-Felin /Nant-yr-Adar which continues to reflect the settlement boundary as defined in the adopted UDP

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5057/DP1 Mr Bernhard Mo	oser						
Date Lodged Status Petition and No. Supporting Eviden 25/03/2012 M 0	ce Additional SA SEA		Rep format: Eform			be consiered by 'written sion of Public examinati	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that Procedural Tests - Consistency Tests -	P1 - Yes	d does not not mee P2 - Yes C2 - No	t one or more test(s) C3 - No		ase indicate which test(s) that it fails.
		ctiveness Tests - CE1		CE2 - No			
3a - Which part of the Deposit Plan are you commenting on?		<u>Paragra</u> r	oh Number:	Proposal Map:		Constraints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plant	an as a result of your re	presentation? Yes	(l	f "No" or "Unanswere	ed" - go to 3d)		
3c - What changes would like to see made to the Deposit Pla	n? New Policy: No Notes:	Amended Policy: No	New Paragraph: No	Amended Paragi No	raph: New Or Ame Yes	ended Site: Other (see I No	Notes):
3d - If your representation relates to a new, deleted or amen	ded site, did you submit Site Name:	t the site as a Candidate	e Site? No	(If "Yes", pl	J	didate Site Name and re eference:	ference if known)
3e - Please set out your representation below: Site MG 2 (16) Collective representation by the Cliff Walk residents: The site MG 2 (16) as currently planned is rejected by the	he signatories of this rep	presentation.					
The two major worries relate to: 1) traffic in and around this part of Penarth, which is alre	eady congested twice a	day (road safety, cyclis	ts, school children,	environment, etc.), a	and		
2) recreational area of the "Cliff Walk", which cannot ad	sorb any more people le	et alone the residents of	f additional 450 dwe	ellings.			
The overwhelming wish of the signatories is that the Co Unfortunately, the planned MG 2 (16) site does not take (first and foremost) represent the needs of the residents	these worries into cons	orries by making bold an sideration. In fact, the re	d sustainable planresidents see their n	ning decisions that re eighborhood jeopardi	flect a 21-century a ized by an ill-advise	approach to the creation ed scheme put forward to	of living space. by the council who should
3f - Please outline the changes you wish to see made to the Put MG 2 (16) back on the list of reserve sites or come	·	, ,	ted residential area				
4b - If you wish to speak, please confirm which part of your in Based on the sparse information available about the sit council".			•	•		_	nortsightedness "our

(ordered by Representation ID No.)

Representor ID and details: 5061/DP1 Mr S A Mi	skin						
Date Lodged Status Petition and No. Supporting E 02/04/2012 M □ 0 □	vidence Additional SA SEA		<u>Rep format:</u> Eform	•	•	to be consiered by 'written resision of Public examination	•
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests -	P1 - No	P2 - No	`,		ease indicate which test(s) th	nat it fails.
	Consistency Tests -	C1 - No	C2 - No	C3 - No	C4	- No	
	Coherence and Effective	veness Tests - CE	1 - No	CE2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting	g on? Policy Number:	Paragra	aph Number:	Proposal Map:		Constraints Map	Appendices:
	SP7(1)	5.55 - 1	ransport			Ancient and Semi Natural Woodland	Appendix 9 - Supporting Documents
3b - Do you wish to see any changes made to the Depo	sit Plan as a result of your repr	esentation? Yes		If "No" or "Unanswer	ed" - go to 3d)		
3c - What changes would like to see made to the Depos	sit Plan? <u>New Policy:</u> No Notes:	Amended Policy: No	New Paragraph: No	Amended Parag	raph: New Or Am Yes	nended Site: Other (see No No	tes):
3d - If your representation relates to a new, deleted or	amended site, did you submit tl Site Name: Model Far			(If "Yes", p	J	ndidate Site Name and refer	ence if known)

3e - Please set out your representation below:

My comments about the rail spur also apply to Policies SP2(3), MG13 and MG20(5).

I live in Llantwit major and am seeking work in Cardiff Bridgend or Swansea. I am involved in Scouting and am also aware of young people's views about the frequency of trains from Llantwit. The current train service frequency from Llantwit needs improving to enable far more commuters to use the train for work, rather than driving daily to Cardiff Bridgend or Swansea. The proposal would prevent any improvement to the frequency of trains from Llantwit or Rhoose as the line would be full to capacity with the proposed airport spur timetable.

The current Saturday 1 hourly and Sunday 2 hourly service from Llantwit is also inadequate. If frequency was increased more people would be able to use the train. Many of us work / shop on Saturdays and would like to use the train but are deterred or prevented from doing so due to the lack of frequent trains. For those who shop / work on Sundays the present service frequency is extremely poor.

The proposal threatens the viability of the existing train service from Llantwit and Rhoose especially during "off Peak" hours. It threatens the existing shuttle service from Rhoose to the airport so those of us travelling from Llantwit to the airport would probably have to travel into Cardiff and back out in order to reach the airport by train - a ridiculous position.

The Llantwit / Rhoose to Cardiff journey time could be quicker if the stops between Barry and Cardiff were reduced, as the current service from Llantwit is slower than driving to Cardiff.

The current rail / bus link to the airport works well, the problem is that it is infrequent - only one train per hour from the airport to Cardiff. If there were more trains from Llantwit and Rhoose into Cardiff and a more frequent bus shuttle from the airport to Rhoose station, the link for air passengers would work far better. If there is capacity to increase trains to an additional 4 trains per hour in order to serve a direct airport link as proposed in the plan, the capacity should be used to improve the frequency of trains to Llantwit and Rhoose providing 4 / 5 trains per hour instead and a far more frequent service for those of us living in Llantwit and Rhoose areas as well as for airport travel.

I am aware from my involvment in scouting and my own teenagers that young people like to travel into Cardiff / Bridgend after school / at weekends -but they find they are unable to do so with ease as the frequency of service prevents this especially on Sundays, isolating them from activities which are available to other young people / teenagers who have better public travel facilities.

The environmental impact of the proposal is substantial, the Vale is an area which is known for agriculture and countryside and this brings tourists to the Vale. The proposal will have a negative affect on Tourism in the Vale and cause significant environmental damage.

The cost of the proposal is a gross misuse of public funds. Even if developers were to fund the capital cost, the ongoing upkeep costs would fall to the Vale tax payers to fund and yet be of no real benefit to

(ordered by Representation ID No.)

Representor ID and details: 5061/DP1 Mr S A Miskin

them.

Any available capital could be better spent improving the existing service with increased trains and shuttle busses, along with improvements to Rhoose, Bridgend and Cardiff stations to make luggage transportation for airport travellers less of a problem. Transporting suitcases, for travellers, particularly for elderly disabled or families travelling to the airport by train has to be easy and current arrangements do nothing to assist these groups.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) My comments about the rail spur also apply to Policies SP2(3), MG13 and MG20(5).

Please refer to my comments above, in addition,:

In terms of the operation of the Airport there is not a strong case for the proposal in economic terms, as passengers using rail links to access the Airport are very much in a minority. On the face of it the link would be economically unviable, and on its own would do little to boost usage of the Airport. Indeed a recently published report concluded that it is the destinations/routes offered that are the main determinants of Airport usage.

Further, at a more practical level there are capacity problems with attempting to target a provision of four trains per hour to the Airport, as this may potentially clash/interfere with further improvements to services on the Vale of Glamorgan line which is already constrained by the freight trains which service Aberthaw Power Station.

The route does not follow the contours, and as such would necessitate making substantial cuttings, two tunnels (one under Port Road and one under the Airport terminal road) and then building a bridge 340m long and approximately 23m high at its highest point where it crosses the existing Whitelands Brook. Clearly, such provision is a major engineering work and would be extremely expensive to construct but it is not a proposal contained within any national or regional transport plan. The works would obviously have an adverse visual impact on this rural and coastal location, and given its elevated nature it would be extremely difficult to mitigate its effect. Such impact is all the more concerning as the immediately adjacent area is identified as an extension to Porthkerry Country Park.

There appears to be no supporting evidence referred to in the Vale of Glamorgan council's Supporting Documents to explain on what basis the alignment of the proposed rail link was selected.

In addition, the construction and operation of the railway would be at the expense of a large carbon footprint.

The route proposed would have an adverse visual impact on this rural area which is currently identified in the Council's own Unitary Development Plan as a 'Green Wedge'.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5062/DP1 Dr Paul & Mrs Su	san Knoyle
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0	Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Letter you want to speak at a hearing session of Public examination? Written
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails. Procedural Tests - P1 - Unanswered P2 - Unanswered Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices: MG2(33)
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)
3c - What changes would like to see made to the Deposit Plan	? New Policy: Amended Policy: Unanswered
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:
3e - Please set out your representation below: Re Vale of Glamorgan Deposit Local development Plan 2 We wish to record our concern regarding the LDP in relati	011 - 2026 - St Nicholas MG2 (33) ion to the village of St Nicholas, and feel that the proposals are unsound and contrary to the development policies of the Vale Council on the following
grounds.	ion to the vinage of at monorae, and feet that the proposals are unsealed and contrary to the development policies of the vale deather on the following
 St Nicholas is an ancient village with a strong rural heri inclusion of this open area of countryside will create further many years. 	tage and is the gateway to the Vale. It is an area of outstanding natural beauty. I wish to protect the historic and cultural qualities of the village. The er urbanisation and bring the Vale closer to Cardiff. The proposed development disregards the boundaries of the village that have been protected for
The size of the proposed development is out of proport was classed as unsustainable due to its location and relia	ion to the size of the village and will increase the population by one third. A planning application submitted in 2009 for 14 properties was refused as it ince on public traspport for residents. Figures prepared by the Vale Planing Department show that there is no demand for social housing in the East Vale.
the village. If proposed developments in Cowbridge and o	flow through the village. The A48 is a busy arterial route which at peak times is congested with great difficulty in turning right from the northern side of other areas further west of St Nicholas are approved, this will further aggravate traffic flow. Culverhouse Cross is an area east of the village which is well the expected increase in visitor numbers to Dyffryn House which this summer is due to be taken over by the National Trust. Visitor numbers are expected ears.
4. There is a lack of amenities in the village with no shops	s, no pub and no post office. Public transport is limited to a half hourly service with retsrictions at night and weekends.
We feel the objections raised above makes the LDP for S	it Nicholas unsound and hope the Inspector will remove the village from the Deposit Plan.
3f - Please outline the changes you wish to see made to the D	eposit Plan to make it sound (if relevant)
4b - If you wish to speak, please confirm which part of your rep	presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Representor ID and details: 5064/DP1 Mr D.G.Wilson							
Date Lodged Status Petition and No. Supporting Evidence 29/03/2012 M 0	Additional SA SEA		Rep format: Letter	, ,	our comments to be consie at a hearing session of Pul	, ,	resentations' or do
•	•	Plan is unsound and o	does not not meet o P2 - Unansw	` '	soundness, please indicate	which test(s) tha	t it fails.
	Consistency Tests -	C1 - Unanswered	C2 - Unansw	vered C3 - Unansv	wered C4 - Unanswe	red	
	Coherence and Effective	eness Tests - CE1 -	Unanswered (CE2 - Unanswered	CE3 - Unanswered C	E4 - Unanswered	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	<u>Paragraph</u>	Number: F	Proposal Map:	Constra	aints Map	Appendices:
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repre	sentation? Unansw	ered (If "	"No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	· ·		New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended Site: Unanswered	Other (see Note Unanswered	<u>s):</u>
	Notes:						
3d - If your representation relates to a new, deleted or amende	d site, did you submit the Site Name:	e site as a Candidate S	Site? Unanswere	ed (If "Yes", pleas	se give the Candidate Site Site Reference:	Name and referer	nce if known)
3e - Please set out your representation below:							
Please accept this letter as evidence of my support for the order of importance. I doubt very much if the existing road There would be an obvious reduction and destruction to oplandscaping and forming possible tourist attractions could	infrastructure could cop pen areas used for gene	e with any alterations. ral leisure activities. W	Safety factors wou	uld have to be consider	red concerning schools, ho	spitals and other	community services.
These items above form part of my support for the LDP. I	would gladly meet and	discuss the matter furt	her should an oppo	ortunity arise.			
3f - Please outline the changes you wish to see made to the De	eposit Plan to make it so	und (if relevant)					
4b - If you wish to speak, please confirm which part of your rep	resentation you wish to	speak to the inspector	about and why the	ey consider it be neces	sary to speak at the hearin	g -	

(ordered by Representation ID No.)

Representor ID and details: 5065/DP1 Christopher Rang	er						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA		<u>Rep form</u> Eform			be consiered by 'written resion of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Procedural Tests -	ne Plan is unsound P1 - Yes	d and does not not P2 - Y		est(s) of soundness, plea	ase indicate which test(s) the	nat it fails.
	Consistency Tests -	C1 - Yes	C2 - Y	es C3	- Yes C4 -	Yes	
	Coherence and Effect	tiveness Tests -	CE1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Para	agraph Number:	Proposal Map		Constraints Map	Appendices:
	MD12	1.1.		MG9		Other - Please specify Designation of Special Landscpaed Areas	
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your rep	resentation? Ye	es	(If "No" or "Una	nswered" - go to 3d)		
3c - What changes would like to see made to the Deposit Plan?	New Policy: No Notes:	Amended Police Yes	y: New Paragra	Amended No	Paragraph: New Or Ame Yes	ended Site: Other (see No No	tes):
3d - If your representation relates to a new, deleted or amende	ed site, did you submit Site Name: Land Eas		lidate Site? Yes	(If "Y	., .	didate Site Name and refer	rence if known)
3e - Please set out your representation below:							

TEST P1

- 1. That it has not been prepared in accordance with the Community Involvement Scheme:
- oThe Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9.
- oRegistered consultees have not been informed of the consultation stages.
- oAccording the WG (Travelling to a better future) there is an onus on the LA to consult with its strategic partners in delivering G&T sites. No consultation has taken place.
- oGood practice (WG Good Practice Design in designing GT sites) suggests where G&T are concerned the local community should be engaged as early as possible we believe that the VoG has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the G&T site in accordance with best practice.

TEST P2

- 1. That the sustainability appraisal is flawed and contradictory proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the VoG which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies

TEST C1

1.The Land Use Plan (with regards to G&T) does not relate to any strategy – The Housing Strategy is out dated and does not provide any structure for assessing G&T needs or site location.

TEST C2

- 1. The Site allocation (in regards to G&T) does not have regard to National Policy:
- o Welsh Government Circular (30/2007)
- ?The site is RURAL and is "UNSUSTAINABLE" as there are no local services (shops; transport; health etc); both Llangan and Fferm Goch Score 0 points in the evidence based assessment SUSTAINABLE SETTLEMENTS APPRAISAL
- ?The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2. ?Business would be operated from the site in contradiction of RURAL EXCEPTION guidance.
- ?The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- ?Recent application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.

(ordered by Representation ID No.)

Representor ID and details: 5065/DP1 Christopher Ranger

?The VoG has refused an application in Bonvilston on the basis of Sustainability and services were closer to this site.

oDesigning Gypsy and Traveller Sites Good Practice Guide - The site is too small; therefore cannot meet the needs identified in the LDP.

?The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus Refuse area; office; play area; infrastructure (roads etc)

?The site does not need the minimum requirements for emergency vehicles (3.7m – it is actually 2.5m)

?The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit land with no public footpath or street lighting.

?The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.

?New sites grants are available (and cost should not be a material planning consideration).

?The guidance requires that sites are:

•Sustainable - this proposal is not

•are equivalent to standards that would be expected for social housing in the settled community – This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans

•have the effect of encouraging and developing good relations between Gypsy Travellers and the settled community – the scale of this proposal can only result in fear and tensions with the local community.

oTravelling to a Better Future

?Recommends that LA's engage with their Housing Association Partners to bring sites forward which the VoG has not done. ?"Situating transit provision on residential sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled community. The proposal is recommending that transient and permanent sites are co-located.

oPlanning Policy Wales

?Is greenfield land in accordance with the definition of brownfield land set out in Figure 4.1 of PPW;

?Will not reduce the need to travel due to the limited local service provision in close proximity to the site;

?Holds very limited access to public transport facilities;

?Is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;

?Is located within a Special Landscape Area and in close proximity to a Conservation Area:

?Does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham evidence):

?Does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities:

?Does not maximise opportunities for community development and social welfare:

?Does not foster social inclusion due to the isolated location of the site: and

?Does not contribute to improvements in health due to the isolation from services and facilities.

TEST C3

1. The policy has due regard to the Wales Spatial Plan.

oThe key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. Therefore it fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan

TEST C4

1.It does not have regard to the relevant Community Strategy.

o"The diverse needs of local people are met through the provision of customer focused, accessible services and information" - This cannot be achieved by the allocation of a non-accessible rural allocation. o"Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" – The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities – shops, health, education etc.

o"Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs" – All services are miles away and inaccessible to the older community. The VERY POOR public transport system is located 1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".

o"People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment" – There is no employment opportunity near to the site. The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

oThe local industrial unit has raised concerns in relation to the scale of the proposal and the implied anti-social behaviour (evidenced by the travellers concerns themselves within the Fordham Report and the Guidance for G&T which recommends sites not larger than 14 units and not of mixed tenure permanent / transient).

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TEST	ı	

(ordered by Representation ID No.)

Representor ID and details: 5065/DP1 Christopher Ranger

1. The Plan does not set out a coherent strategy which its policies and allocation logically flow:

oThe Strategy makes the following statements:

?The LDP will seek to provide a policy framework which:

Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective

oThe LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."

The allocation of MG9 does not meet these objectives being in a Rural Location with inadequate facilities and transport links.

oThe Allocation of MG9 does not comply with the following objectives:

?Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. – The sites location would clearly not meet this objective.

?Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. – Site location prohibitive.

Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport – Site location prohibitive.

?Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment (Planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area" ?Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan – The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.

?Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations – This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that GT sites are treated differently from other housing allocations. An inclusive policy would see GT sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP ?Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources.

•The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations.

This is agricultural land in the Special Landscaped Area

TEST CE2

- 1.The strategies; policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:
- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2.The G&T site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the G&T site assessment states that this is good.
- 3.The G&T site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access. At 2.5m against a minimum 3.7m plus footpath of 1.2m.
- 4.The G&T site assessment does not reflect the current legal obligations of the Council, yet the other site assessments highlight legal issues.
- 5. Several Private sites were put forward as candidate sites for G&T but were dismissed as they were not in Council ownership what was the point of asking the private sector.
- 6. The key issue is that the site allocation does not reflect the identified need of the G&T community as highlighted in the Fordham report.
- 7. The G&T site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site.
- 8. The assessment makes no reference that the site is in a Special Landscape Area.
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is questionable. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that 0 new jobs have become available in the last 9 years and that the units employ less than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98) of the 5 sites with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet.
- 12. The VoG has undertaken a study (Fordham) where the message was extremely strong that the G&T community wanted smaller sites located on the fringes of larger communities. The report confirmed that

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isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives (This is a key point so should be strongly emphasised).

"Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car'; 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools"

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: "Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of onsite conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport.Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of 'integrated co-existence' between the site and surrounding community.19 The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage.

13.An independent highway study surrounding the proposed site has concluded that: "The1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a travellers site development, in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32, offers guidance where it states that a desirable minimum carriageway width of 5.5metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians. However, as there is no direct access off the lane (apart from into the proposed development)"

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Representor ID and details: 5065/DP1 Christopher Ranger

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

TEST CE3

- 1.The VoG make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff, has 3 full time staff.
- 2.The current Housing Strategy expires Apr 2012 and makes no relevant reference as to how the Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the G&T community or housing at all.

TEST CE41.

Policy MD12 (G&T) is discriminatory. It offers no flexibility for the VoG to bring forward sites that are sustainable / suitable for G&T through the policies derived within the plan. 2.MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the RSL sector

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - 1.1 am suggesting that the site MG9 is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.
 - 2.I am suggesting that Policy MD12 is amended so that it does not discriminate against the G&T community. All sites during the plan should be assessed on a similar basis as Affordable Housing.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 5066/DP1 Aberthaw Reside	nts Committee					
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 □	Additional SA SEA	Rep format: Eform			consiered by 'written ro of Public examination	
2a - Do you consider the LDP is Sound? Unsound	2b - If you think that the Plan is unsound ar Procedural Tests - P1 - No	nd does not not meet o	one or more test(s) of	soundness, please i	ndicate which test(s) the	nat it fails.
	Consistency Tests - C1 - No	C2 - No	C3 - No	C4 - No		
	Coherence and Effectiveness Tests - CE	1 - No C	E2 - Yes	CE3 - No	CE4 - No	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragra	ph Number: Pi	roposal Map:	<u>)</u>	Constraints Map	Appendices:
	MD1					
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your representation? Unan	swered (If "N	No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan'	New Policy: Amended Policy:	New Paragraph:	Amended Paragrapl		d Site: Other (see No	
	No No	No	No	No	No	
	Notes:					
3d - If your representation relates to a new, deleted or amende	d site, did you submit the site as a Candidat Site Name:	te Site? Unanswered	d (If "Yes", pleas	se give the Candidat Site Refere	te Site Name and reference:	rence if known)
3e - Please set out your representation below: Change to Housing Allocation Policy MG2 (Rhoose) 23 & Rhoose has developed from a small, self-contained villag Over 30 years ago, Rhoose benefitted from the building o of through traffic. However, as Rhoose has grown in size the begining of the Rhoose and East Aberthaw Bypass be intended traffic benefit of the by-passfor East Aberthaw. T related fatal accidens on record and several traffic related its through-road is a bottle-neck for traffic. The village hot Glamorgan Council to address the road safety issues. The possibility of further traffic being generated by the ad	e and holiday resort into a dormitory town wife the Rhoose and East Aberthaw By-pass whas a dormitory town it has increasingly generated the set of the volume of Rhoose's westward bound continuidents. Unlike Rhoose, East Aberthaw has ses many young children and elderly people dition of a further 730 houses in Rhoose is a	thout many of the ancillable rerouted the westwerated its own traffic outling the boundary remained largely under the particularly very who are particularly very the control of the contr	ward bound traffic aw utput. Properly, outbo by-pass route - takes t ng continual safety con changed as a village rulnerable to dangers	support its transition ray from these two vund, eastward-boun he shorter route throncerns for the reside in size or character	n. illages and successfull d traffic from Rhoose f bugh East Aberthaw the ents of East Aberthaw. and is designated a Co	ly relieved the villages flows onto Port Road at ereby reversing the with three speed onservation Area and
The deletion of the proposal for further housing develop 2) Traffic outbound from Rhoose to use the Rhoose & eas						
4b - If you wish to speak, please confirm which part of your rep Pedestrian safety - traffic calming, traffic volume the traffi		tor about and why they	y consider it be neces:	sary to speak at the	hearing -	

(ordered by Representation ID No.)

<u>ate Lodged</u> <u>Sta</u> 01/04/2012 N	atus M	Petition	n and No. 0	Supporting Evidence	Additional SA SEA			Rep format: Comment forr	,	,	o be consiered by 'writte ssion of Public examinat	•
a - Do you consid	der the	LDP is	Sound?	Unsound	2b - If you think that the Procedural Tests -			nd does not not mee P2 - Yes	et one or more test(s)	of soundness, ple	ase indicate which test(s	s) that it fails.
					Consistency Tests -	C1 - Y	es	C2 - Yes	C3 - Yes	C4	- Yes	
					Coherence and Effect	iveness To	ests - CE	1 - Yes	CE2 - Yes	CE3 - Yes	CE4 - Yes	
a - Which part of	the D	eposit F	Plan are yo	ou commenting on?	Policy Number:		Paragra	aph Number:	Proposal Map:		Constraints Map	Appendices:
					MG9. MD12. MG2		6.49. 6	5.52. 7.41. 7.44.	MG9		Feb 2012	Appendix 9 - Supporting Documents
o - Do you wish to	to see	any cha	anges mad	de to the Deposit Plan	as a result of your rep	resentatio	n? Yes	(I	f "No" or "Unanswere	ed" - go to 3d)		
; - What changes	s woul	d like to	see mad	e to the Deposit Plan?	New Policy: Unanswered Notes:	Amende Yes	ed Policy:	New Paragraph: Unanswered	Amended Paragi Unanswered	raph: New Or Am Yes	ended Site: Other (see Unanswere	
d - If your repres	sentati	on rela	es to a ne		d site, did you submit t Site Name: Land Eas			ate Site? Yes	(If "Yes", pl	•	ididate Site Name and re eference: Site Reference	,
e - Please set ou	,				green field area close	o the Han	nlet of Llar	gan and would place	e an unacceptable pre	essure on the loca	I infrastructure and servi	ces.
The propose												

Additional information attached:

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site. Registered consultees have not been informed of the consultation stages.

According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.

Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible – we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

The Sustainability Appraisal is flawed and contradictory – the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011). The allocation of MG9 is not consistent with the proposed LDP policies

(ordered by Representation ID No.)

Representor ID and details: 5067/DP1 Carl Morecroft

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy – The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TEST C2

The Site allocation does not have regard to the following National Policy:

Welsh Government Circular (30/2007)

The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'

The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.

Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.

The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.

Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.

The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.

Designing Gypsy and Traveller Sites Good Practice Guide - The site is too small: therefore cannot meet the needs identified in the LDP.

The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)

The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m – it is actually 2.5m).

The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.

The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.

New sites grants are available (and cost should not be a material planning consideration).

The guidance requires that sites are:

Sustainable - the Llangan site proposal is not

equivalent to standards that would be expected for social housing in the settled community — This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans

have the effect of encouraging and developing good relations between Gypsies & Travellers and the settled community – the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.

Based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.

Travelling to a Better Future

Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.

"Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.

Planning Policy Wales 2011

The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4.1 of PPW;

it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;

offers very limited access to public transport facilities:

is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide; is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen form the conservation area.

does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 - evidence);

does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;

does not maximise opportunities for community development and social welfare:

does not foster social inclusion due to the isolated location of the site; and

does not contribute to improvements in health due to the isolation from services and facilities.

2.

MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

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TEST C3

1. The policy does not have due regard to the Wales Spatial Plan.

The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan

TEST C4

The allocation of this site does not have regard to the relevant Community Strategy in the following respects:

"The diverse needs of local people are met through the provision of customer focused, accessible services and information" - This cannot be achieved by the allocation of a non-accessible rural allocation.

"Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" - The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities - shops, health, education etc.

"Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs" – All services are miles away and inaccessible to the older community. The VERY POOR public transport system is located 1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".

"People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment" – There is no employment opportunity near to the site. The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

The small local industrial unit has raised concerns in relation to the scale of the proposal.

TEST CE1

The Plan does not set out a coherent strategy in the following respects

The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan The allocation of this rural site in open countryside does not meet this objective.

The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a Rural Location with inadequate facilities and transport links.

The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:

Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. – The site's location would clearly not meet this objective.

Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. – The allocation of this site will have entirely the opposite effect to this objective.

Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport – The allocation of this site will have entirely the opposite effect to this objective.

Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment – The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"

Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan – The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.

Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations – This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP

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Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.

The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.

The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access – the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.

The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.

Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.

The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.

The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.

The assessment makes no reference that the site is in a Special Landscape Area (SLA)

The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.

The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Fferm Goch has a population of less than 100 (98) – of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet. Fferm Goch should be recategorised as a Hamlet.

The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:

"Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car'; 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools"

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Royerway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the launderette and health centres"

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"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of 'integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment. "

"The village school is approximately 1km from the village and 900metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a travellers site development, in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32, offers guidance where it states that a desirable minimum carriageway width of 5.5metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

There is complete inconsistency with the allocation of MG9 against the proposed policies.

TEST CE3

The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.

The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

TEST CE4

Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.

To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.

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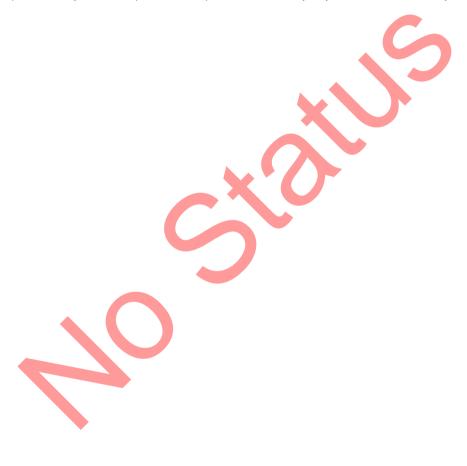
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3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy & Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



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Date Lodged Status Petition and Detection of the properties of the propertie	d No. Supporting Evidence	Additional SA SEA		Rep format: Comment form		our comments to be co at a hearing session of		
2a - Do you consider the LDP is So		2b - If you think that the Procedural Tests -	he Plan is unsound and P1 - Yes	does not not meet P2 - Yes	one or more test(s) of	soundness, please ind	icate which test(s)	hat it fails.
		Consistency Tests -	C1 - Unanswered	C2 - Yes	C3 - Yes	C4 - Yes		
		Coherence and Effect	tiveness Tests - CE1	· Yes (CE2 - Yes	CE3 - Unanswered	CE4 - Unanswer	ed
3a - Which part of the Deposit Plan are you commenting on?	Policy Number:	Paragraph	<u>Number:</u> <u>I</u>	Proposal Map:	Col	nstraints Map	Appendices:	
		MG2	5.11		Proposals map Residential allocations 145); Housing Supply Paper (November 201	t <mark>ab</mark> el (page Background		
3b - Do you wish to see any change	es made to the Deposit Plan	as a result of your rep	oresentation? Yes	(If '	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to se	e made to the Deposit Plan?	New Policy: Unanswered Notes:		New Paragraph: Unanswered	Amended Paragrag Yes	<u>New Or Amended S</u> Yes	Site: Other (see No Unanswered	otes):
3d - If your representation relates t	•	d site, did you submit	the site as a Candidate den Emporium, Fferm G		(If "Yes", plea	use give the Candidate S	Site Name and refe e: ID30 in the draft	,
3e - Please set out vour represent	ation helow:							

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE, FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) – in particular for 42 and (after revisions) 24 houses - have been considered and rejected by the Council in the past. The issues that led to those rejections – in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant – have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built – we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be live-work units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.
- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 30% - edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15

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people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site. Our representations in relation to each of the tests of 'soundness' are as follows:

TEST P1 - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to/better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This '+' rating should be changed to a '--' (strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '- -' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '- -' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '--' (strongly detracts) rating.

TEST C2 – It does not have regard to National Policy

- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1.The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27,

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ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LPA not to impose this condition. However, the LPA insisted it was required. There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers). This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway).

This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. ... Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that , 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant – the local primary school (Llangan primary school) and highways issues:

Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i.e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a \$106 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils. Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary schools (it did not specify any in particular) to accommodate the children from 12 houses – 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road – with the primary access to serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times – many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian/cycleway to Llangan primary school from Fferm Goch/Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans:...

- The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility
- The capacity of existing and potential infrastructure including public transport... and social infrastructure (such as schools...), to absorb further development and the cost of adding further infrastructure..."
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

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It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 35 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180,000 and No.8 has been on the market for £185,000. Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable housing on the site defies logic. At a rate of 35% this would only give 14 affordable houses – an increase of only 10 affordable houses from the existing planning permission – at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design."

- 5. If 40 houses are built on the Garden Emporium site this will be significant over-development of this site at a density which should not be permitted in this location. The following points are relevant:
- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 of PPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6.If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

- a) Condition (condition 9) that a significant proportion of the site (approx. 30% being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all properties shall be located at least 10 metres from this boundary within the development site; and
- b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was

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found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The reports says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site – which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone – a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4.6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (WSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 – It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools)
- "4. Older people are valued and empowered to remain independent, healthy and active.

 They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent. Also, there are no local services available to them such as healthcare, library or other local amenities.
- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

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"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals and businesses are developed and the quality of

the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services,

information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST CE1 – The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements – one of these is 'Other sustainable settlements to accommodate further housing and associated development'. This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5.10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch – for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing..."

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and all learning, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP.

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" – The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." – The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" – The proposed development of the Garden Emporium site represents over-development of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" – The proposed development at the Garden Emporium site will place increased pressure on resources – in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs." – There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." - If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

TEST CE2 – The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

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1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') Fferm Goch should have been classified as being one of the rural hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full '3'score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- B) it is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- D) it was not originally classified as a "Minor Rural Settlement" it seems to have been re-classified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- E) the settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate. This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.
- F) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position".
- G) if the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply Hamlets/Rural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- H) he draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- '• Fayour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.
- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.'

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states, 'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

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i) if it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site – this is an exceptional site in this location.

2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of Fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- B) the number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (un sustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- C) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required... to preserve a feature that would contribute to existing or future local amenity.

In relation to point 1. above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
 - a) Section 5.11 (page 26) delete Fferm Goch from the list of Minor Rural Settlements.
 - b) Policy MG2 (page 74) amend the number of houses allocated to The Garden Emporium. Fferm Goch from 40 to 12.
 - c) Residential allocations table (page 145) amend number of dwellings at The Garden Emporium, Fferm Goch from 40 to 12
 - d) Proposals map amend to exclude back area of site MG2(30) identified as habitat management area edged green on attached plan
 - e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Emporium, Fferm Goch number of units should be 12, not 220.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Paragraph 5.11 (designation of Fferm Goch as a minor rural settlement)

Policy MG2 (allocation of the Garden Emporium Site, Fferm Goch for 40 houses)

I am concerned that my representations may be dismissed by the Council and I would like the opportunity to make sure they have been understood.

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Representor ID and details: 5068/DP1 Mr Brian Mc Con	кеу			
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M □ 0 ✓	Additional SA SEA		your comments to be consiered by 'written repuls at a hearing session of Public examination?	
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests - P1 - Unanswered	does not not meet one or more test(s) of P2 - Unanswered C2 - Unanswered C3 - Unar	of soundness, please indicate which test(s) that	it fails.
	Coherence and Effectiveness Tests - CE1 -	Unanswered CE2 - Unanswered	CE3 - Unanswered CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: Paragraph 75	Number: Proposal Map: MG2(26)		Appendices:
3b - Do you wish to see any changes made to the Deposit Plar	as a result of your representation? Yes	(If "No" or "Unanswere	d" - go to 3d)	
3c - What changes would like to see made to the Deposit Plan		New Paragraph: Amended Paragra Unanswered Unanswered	Aph: New Or Amended Site: Other (see Notes Unanswered	<u>-</u> <u>\$):</u>
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the site as a Candidate s Site Name: Land at the West of Port Road, V		ease give the Candidate Site Name and referen Site Reference: 2568/CS1	ce if known)
3e - Please set out your representation below: For my representation please see the Local Developmen	Plan objection document by Herbert.R.Thoma	s attached.		
3f - Please outline the changes you wish to see made to the D For my representation please see the Local Development		s attached.		
4b - If you wish to speak, please confirm which part of your re	presentation you wish to speak to the inspector	about and why they consider it be nec	essary to speak at the hearing -	

(ordered by Representation ID No.)

Representor ID and details:	5069/DP1 Mrs Judith Billingh	nam						
Date Lodged Status Petition 02/04/2012 M	and No. Supporting Evidence 0	Additional SA SEA		Rep format: Comment form	* *	our comments to be cons	•	•
2a - Do you consider the LDP is		•	e Plan is unsound and P1 - Unanswered	does not not meet P2 - Unansw	` '	f soundness, please indica	ate which test(s)	that it fails.
		Consistency Tests -	C1 - Unanswered	C2 - Unansv	vered C3 - Unans	swered C4 - Unansw	ered	
		Coherence and Effecti	veness Tests - CE1	- Unanswered	CE2 - Unanswered	CE3 - Unanswered	CE4 - Yes	
3a - Which part of the Deposit P	lan are you commenting on?	Policy Number:	<u>Paragrapl</u>	h Number:	Proposal Map:	Const	traints Map	Appendices:
		75			MG2(26)			
3b - Do you wish to see any cha	nges made to the Deposit Plan	as a result of your repr	resentation? Yes	(If	"No" or "Unanswered	" - go to 3d)		
3c - What changes would like to	see made to the Deposit Plan?	New Policy: Unanswered	Amended Policy: Unanswered	New Paragraph: Unanswered	Amended Paragrap Unanswered	oh: New Or Amended Site	e: Other (see Note of the Control of	otes):
		Notes:						
3d - If your representation relat	•	d site, did you submit tl Site Name: Land at th			(If "Yes", plea	ase give the Candidate Site Site Reference:		erence if known)

3e - Please set out your representation below:

For my representation please see the Local development Plan objection document by Herbert.R.Thomas attached and our own letter dated 11th March 2012 (attached).

RE: VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN

We are writing to express our view on the local development plan issued by the Vale of Glamorgan Council which is currently available for consultation.

We have a number of objections to the plans specifically those that relate to our own community of Wenvoe. These objections are outlined below.

MG-2 (26) Land to the West of Port Road Wenvoe (6.98 ha - 150 homes).

1.Firstly we would like to highlight the small field at the very west of this planned development. The field abuts Port Road and the garden centre. This field is filled with orchids - certainly common orchids, possibly bee orchids and other flowers. We are not wildlife experts but the field contains a rich variety of fauna and flora. Before these plans go any further there is a need for a full and comprehensive ecological appraisal of this field and surrounding hedgerows. This appraisal should be carried out in full partnership with the award winning Wenvoe Wildlife Group who have a magnificent track record in protecting orchids and the natural environment locally. Your document states under MD6 page 63 that "new residential, commercial and community development will be required where possible to positively contribute to biodiversity" and also that "maintaining and enhancing existing important biodiversity features exist such as woodlands, trees, hedgerows, wetlands, water courses, ponds, green lanes, green corridors, geological features and habitats".

This development contradicts these stated aims in the development plan. The plan by point 6.25 even has picture of a field containing orchids; exactly the type of habitat that will be destroyed for ever by this planned development.

2. This development which plans to build 150 homes is totally overwhelming to the size of the village. It will swamp the village. The nearby developments in Barry and Culverhouse Cross will mean that there are only a few fields either side of the village destroying the uniqueness of Wenvoe.

The plan states on page 144 that "highway links with existing village via Clos Llanfair to the north". This will result in at least 150 housholders most of whom will have at least one car having to drive down this current cul de sac with quite narrow roads and then on through the village. Wenvoe is currently designed so that there are very few 'through roads' ensuring traffic is kept to the 'main roads 'through the village. This plan will certainly have an extremely negative effect on the quality of life of all those residents living on the south side of the village; in particular residents of Clos Llanfair, the private drive off Clos Llanfair, Church Rise, Walston Road and Old Port Road.

(ordered by Representation ID No.)

Representor ID and details: 5069/DP1 Mrs Judith Billingham

On page 84 of the plan (MG-6) it states that "new development will not be permitted where the proposed development 3, is of a scale and form that is commensurate with the surrounding area" and 5 "has no unacceptable impact on the amenity and character of the locality by way of noise, traffic, congestion and parking".

Furthermore under MD1 (point 5) the plan states "where new infrastructure can be provided without any unacceptable effect on the natural or built environment"

It seems to us that this development for Wenvoe contravenes the above aims within your plan and on that basis we object strongly to the proposals.

3. We would like to propose that the local development plan as well as the green wedge to the north of the village makes the land to the south - from the village to development MG2 (9)- a green wedge to prevent as your plan states "the coalescence of settlements". This has become more vital now that the new crematorium has been developed on part of this land.

MG 22(3) Development at HTV studio

This development should not be progressed. It is a smaller version to those plans that were rejected a few years ago when some of the main concerns surrounded traffic on Port Road and at Culverhouse Cross itself - these concerns still remain.

We were well aware of the history and development of the Culverhouse Cross junction as Nigel has written three books on the history of Ely which includes this area. Therefore we have some historical perspective on how the traffic has continually increased in this area.

This development will add at least 220 cars almost daily using this junction. There are no cycle paths available and the current bus time table during rush hour (no bus between 8.15a.m and 9.10 am) makes car travel the only feasible option for commuters. The extra traffic resulting from this development will only add to what are already unacceptable levels of traffic and delays.

Further traffic levels caused by this development will lead to more car users using Wenvoe as a 'cut through' down Old Port Road to Culverhouse Cross thus having a negative impact on the quality of life of Wenvoe residents. More commuters will also use Caerau Lane as a short cut; a road that is woefully inadequate to cope with more traffic. This increase in traffic will have major implications for the catholic school and residents at the 'top end' of Caerau.

We trust that our objections will be seriously considered and that you will rethink your plans for these two developments around Wenyoe.

We look forward to hearing from you.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

For my representation please see the Local development Plan objection document by Herbert.R.Thomas attached and our own letter dated 11th March 2012 (attached)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

Representor ID and details: 5070/DP1 Mr Nigel Billingha	m						
Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0 ✓	Additional SA SEA		Rep format: Comment form			ered by 'written representation's Written	
2a - Do you consider the LDP is Sound? Unsound	Procedural Tests - F	P1 - Unanswered	P2 - Unans	wered	soundness, please indicat	te which test(s) that it fails.	
	Coherence and Effective	ness Tests - CE1 -	Unanswered	CE2 - Unanswered	CE3 - Unanswered C	CE4 - Yes	
3a - Which part of the Deposit Plan are you commenting on?	Policy Number: 75	<u>Paragraph</u> 	Number:	Proposal Map: MG2(26) MG2(26)	<u>Constr</u>	raints Map Appendic	<u>:es:</u>
3b - Do you wish to see any changes made to the Deposit Plan	as a result of your repres	entation? Yes	(li	f "No" or "Unanswered"	- go to 3d)		
3c - What changes would like to see made to the Deposit Plan?			New Paragraph: Unanswered	Amended Paragrap Unanswered	h: New Or Amended Site Yes	: Other (see Notes): Unanswered	
3d - If your representation relates to a new, deleted or amende	ed site, did you submit the Site Name: Land to the			(If "Yes", pleas	se give the Candidate Site Site Reference:	Name and reference if kno 2568/CS1	wn)
20 Please set out your representation below:							

For my representation please see the Local Development Plan objection document by Herbert.R.Thomas attached and our own letter dated 11th March 2012 (attached).

RE: VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN

We are writing to express our view on the local development plan issued by the Vale of Glamorgan Council which is currently available for consultation.

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Representor ID and details: 5070/DP1 Mr Nigel Billingham

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