

The Croft,
Cowbridge Road,
St. Nicholas,
Vale of Glamorgan,
CF5 6SH.

Mr. S. Rennie
Planning Department
Vale of Glamorgan Council
Dock Office
Barry Docks
Barry, CF63 4RT

1st April 2015

Dear Mr. Rennie,

Ref: - Application No. 2015/00249/FUL/SR2 Land to the east of St. Nicholas

In response to your letter reference P/DC/SR2/2015/00249/FUL dated 13th March 2016 I would like to state my objection to the amended form of the proposed development, 2015/00249/FUL/SR2, on the Eastern boundary of St. Nicholas, Vale of Glamorgan.

Building 101 houses with the associated ~ 202 cars on 3.65 ha of high quality (good) agricultural land at the boundary a rural village of ~ 144 houses is does not seem to be a sound development and is in my opinion inconsistent with the objectives stated in LDP Vision document. A development of this sale would substantially change the character of the village.

Neither the site of the planning application, nor the proposals for this site appear to relate to sound spatial planning practices, the Wales Spatial Plan or Planning Policy Wales (PPW) and relevant Technical Advice Notes (TAN). Furthermore, the plan does not appear to deliver the intentions of the emerging LDP.

The modifications described in the amended plans do not address the following areas of concern and as such do not make this application acceptable development.

- The Welsh Government's presumption against unsustainable development;
- The impact of the proposed development on the St Nicholas Conversation Area, the Ely Valley and Ridge Slopes Special Landscape Area;
- Absence of demand for affordable housing in the area;
- The loss of finite, scarce agricultural land rated: good;
- Disruption of traffic on and in the vicinity of the A48 in St Nicholas;
- Inclusion of infrastructure to support future developments to the East of the St Nicholas.

Unsustainable development.

- With limited public transport, footpaths and cycle paths, it is likely that the primary mode of transport from these proposed dwellings will be by car. As there are very limited amenities in the village this will necessitate the use of cars to travel to work and carry out basic shopping tasks.
 - The "Inclusive access" section of the Design and Access Statement (February 2016) suggesting a Travel Plan will be generated to "Promote travel by public transport,

walking and cycling & Reduce reliance on the private car”. However this is not going to change the fact that the principle mode of transport for the inhabitants of these dwellings will be cars.

In the case of this application, it is considered that the development would not accord with the key principles and policy objectives of sustainable development as defined by PPW. To demonstrate this harm, the scheme is assessed against relevant sustainability objectives provided in Section 4.4 of PPW below:

- **Promote resource-efficient and climate change resilient settlement patterns** -Given the lack of services and facilities within the village there is a real possibility that the proposed development will increase dependency on cars, promoting unsustainable travel patterns. As there is no identified affordable housing need within the East Vale area most, if not all of this development should be re-distributed to the areas where the need is greatest, which is also where there are the greatest number of services and facilities. This should result in a more sustainable pattern of development. The prematurity of this scheme does not allow for this consideration in the most appropriate forum;
- **Locate developments so as to minimise the demand for travel, especially by private car** – the lack of services and facilities within St Nicholas will mean that residents of the proposed development will have to access services and facilities in other areas. The majority of these trips will be made by car;
- **Support the need to tackle the causes of climate change by moving towards a low carbon economy** – the proposed development is adjacent to a village with limited services and facilities. Residents of the proposed development will therefore have to access services and facilities within higher tier settlements. The majority of these trips will be made by car and therefore the development will not assist in tackling the causes of climate change.
- **Help to ensure the conservation of the historic environment and cultural heritage, acknowledging and fostering local diversity** – the proposed development will have a significant harmful effect on the St Nicholas Conservation Area.
- **Ensure that all local communities – both urban and rural – have sufficient good quality housing for their needs** – there is currently no affordable housing need within the Eastern Vale area. The majority of need is within Barry, Penarth and the Coastal areas, where there exists a greater number of services and facilities.
- **Promote access to employment, shopping, education, health, community, leisure and sport facilities and open and green space, maximising opportunities for community development and social welfare** – the application does not provide access to any employment, education, shopping, community and leisure or sports facilities. Whilst it does provide an element of public open space, there is no certainty provided by the application as to whether the public open space provided will meet the deficit of specific types of public open spaces in St Nicholas, which was a major consideration in the site’s allocation in the Deposit LDP.
- **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** – the proposed development does not provide any improvements to accessing services and facilities, both for the existing and proposed resident population. Conversely, it could create an unsustainable pattern of development and a greater dependency on the private car.

- ***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*** – as indicated above, the proposed development would lead to a greater dependency on the use of cars.

It is clear from the assessment above that the proposed development would not constitute sustainable development and therefore the presumption in favour of sustainable development that applies as a result of the time lapsed nature of the Adopted UDP and the housing land supply situation from 2016, does not apply.

The Impact on the St Nicholas Conservation Area

The application site is located immediately adjacent to the boundary of the St Nicholas Conservation Area. The Conservation Area was first designated in 1970 in recognition of the Villages special architectural and historic interest. The proposed development would adversely affect the setting of the Conservation Area and would be very visible on the approach to the village.

The proposed demolition of Emmaville to provide access to the site will significantly impact the appearance of the entrance to the village and adversely impact the local environment of buildings close to the new entrance.

No Demand for affordable housing in East of Vale of Glamorgan.

As stated above there is no affordable housing need within the East Vale area as indicated in Table 8 of the Council's Local Housing Strategy (2015-20).

Degradation of valuable agricultural land.

High quality agricultural land is a valuable resource which should be retained where possible in the UK. This land provides environmental, economic and security benefits and should be viewed as an asset for our country. This type of land is not suitable for residential development until all other sources of land have been exhausted.

Disruption of traffic on A48.

The A48 at St Nicholas, which has a 30mph speed limit, can be very congested with traffic at certain times of the day. Frequently during rush hours cars can be slowly travelling "nose to tail" for 10's of minutes. The assertion in the Transport Assessment Addendum of March 2016 document section 2.10 that the site could accommodate more traffic than could be expected from 200 dwellings maybe correct in isolation of the volume and flow of traffic on the A48. It seems hard to believe that the proposed development will not have an adverse impact on the operation or safety of the existing local highway network.

It can frequently take several minute for us to leave our driveway in the village which faces directly onto the A48. At rush hours without the traffic lights changing at the Dyffryn turn it can be very difficult for us to get onto the west bound section of A48.

The additional vehicles associated with this development must result in additional load on the transport system and will result in more congestion and also potential increased risk for school children crossing the A48 on their way to/from school.

Inclusion of infrastructure to support Future developments to East of St Nicholas Area.

This application should be considered as providing infrastructure to support future “urbanization” of St Nicholas. As the access road to this site is supposedly designed to support 200 dwellings this development should also be considered with (2015/00662/FUL/SR2) and not in isolation. If this development occurs it will likely be used support further “unsustainable” developments in the St Nicholas area.

In conclusion, I view this application as an “unsustainable” development which should not be considered near a Conservation Area such as St Nicholas. The proposed development is a poor use of valuable agricultural land and will likely be the “thin end of the wedge” as it promotes future “unsustainable” developments to the East of St Nicholas.

Yours sincerely,

Dr John Macneil.