

It would appear that once these areas of green space are discounted, the provision of a single LEAP and LAP would only yield approximately 0.05ha, against a policy requirement of 0.48ha. Even including the areas of land surrounding the LEAP and LAP, a total of around 0.27ha is provided, which is somewhat short of the policy aspiration.

Given that a significant aspect of the justification for the allocation of the wider site for housing was to render the deficiency of children's play space in St. Nicholas, there is a need to ensure that this scheme delivers the right quantum and form of public open space. For the reasons outlined above, and absent any information provided by the applicant, my Client believes that this is not the case. Only the delivery of a comprehensive scheme on the site, which properly articulates the policy aims of the emerging Plan can provide this certainty.

Accordingly, for the reasons outlined above, the submitted application conflicts with the emerging LDP.

The Application's Conformity to PPW's Objectives

Within the accompanying Planning Statement, the applicant contends that the Unitary Development Plan is out-of-date and therefore in accordance with TAN 1, the Local Authority will be unable to demonstrate a 5 year housing land supply from January 2016. Accordingly the applicant considers that the development benefits from the presumption in favour of sustainable development and therefore should be approved.

However, it is clear that the presumption in favour of the development would only apply if the proposals accorded with national planning policies and the key principles and policy objectives of sustainable development.

In any event we note that a shortfall of land supply does not lead to unacceptable development being made acceptable. We note that similar conclusions were presented in a number of recent Appeal decisions within Wales, including:

Land at Rockfield Road, Monmouth

In this case the land supply stood at 4.4 years (2012) and common ground between the parties that it would fall to 3.6 years in the 2013 study. The site was also located outside of the settlement boundary. Whilst the Inspector considered there were no technical or landscape constraints, the stage of the LDP (awaiting the Inspectors Report), it was considered premature in relation to the imminent (at that time) LDP which would deal with matters related to the scale of growth at Monmouth.

Land at Red Barn Farm, Abergavenny

The land supply stood at 4.4 years, however, the Inspector considered that the impact of the development on the nearby listed building and landscape would outweigh the shortfall and dismissed the appeal.

Began Road, Cardiff

Despite a significant shortfall in housing land (and recent appeal decisions granting permission) the Inspector considered that the adverse impacts on landscape, highways safety and ecology outweighed the housing shortfall and dismissed the appeal on the small site.

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*** - the proposed development will increase the size of St Nicholas by around 63%. Given the lack of services and facilities within the village there is a real possibility that the proposed development will increase dependency on the car, 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 the private 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 the private 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 and locally important and listed buildings. A robust assessment of this harm has not been undertaken by the applicant.

- ***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, 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 private car.

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 Community Infrastructure

St Nicholas Church of Wales Primary School has 126 places within the school and currently 125 pupils on roll. Whilst there is reference to a S106 contribution being provided to mitigate the impact of the proposed development on existing education facilities, the development will clearly lead to the need to expand and extend the existing school, or to alter the school's admissions policy. No information has been provided by the applicant which demonstrates whether this is achievable, or whether capacity will need to be created in an alternative location, which could, given the frequency of the bus service and the need to safeguard children of a primary age, lead to a dependency on the car for pupils to attend school.

The Impact on the St Nicholas Conservation Area

Part of the application site is located within 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.

Whilst the application site is not identified as being of key importance to the Conservation Area within the St Nicholas Conservation Area Appraisal and Management Plan (2009), there still remains the statutory duty provided by Planning (Listed Buildings and Conservation) Areas Act (1990) for Local Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area when determining planning applications. In that regard, we note that aside from a very limited analysis provided in the Design and Access Statement and an visual assessment of the impact of the development on the surrounding environs, there is no specific assessment on what effect the proposed development will have on the Conservation Area, or even an

assessment of the contribution Emmaville makes to this designation. Similarly there is no assessment of the impact the proposed development will have on historic assets within the surrounding environs, including Eastlea, Milford and the 'County Treasure' of the Police Station (all are located to the south of the A48 and immediately opposite the proposed access and proposed Section 278 works) and the Three Tuns Listed Building located immediately to the south west of the application site and to the north of the A48.

It is noted that in the Council's pre-application response it was highlighted that the proposed development would *"have the potential to significantly impact the setting of the Conservation Area and would be very visible on the approach to the village."*

On this basis the Council advised the applicant that *"careful consideration should be given to ensuring that the proposed development would not have any adverse impact on the character of the conservation Area, through use of sensitive and suitable house design and layout."*

Moreover, in response to the proposed allocation of land to the east of St Nicholas, the Council's own Conservation Officer had concerns over the impact of the proposed allocation on the St Nicholas Conservation Area. In their consultation response, the Officer stated that:

"The site lies outside, but immediately adjacent to, the St. Nicholas Conservation Area. The St. Nicholas Conservation Area Appraisal and Management Plan identifies a significant view out of the Conservation Area across the site in a NE direction from the A48 at 'Mink Hollow' approximately along the line of the public footpath."

The proposed development, which would lead to the loss of a property and the development of highways works in the heart of the designation, would clearly lead to an adverse impact. No robust information has been submitted by the applicant to indicate otherwise.

There can be no certainty that the proposed development will have *"no unacceptable impact on the Conservation Area"* as claimed in Section 9 of the Design and Access Statement.

Summary

I object to the proposed development on the following grounds:

- In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, applications for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise. For the Vale of Glamorgan, the UDP forms part of the Development Plan.
- National Planning Policy states that where there is a time lapsed Development Plan, as is the case in the Vale, the presumption in favour of sustainable

development applies. It follows that there is a presumption against unsustainable development. The present application constitutes unsustainable development.

- Para. 4.2 of PPW outlines that certainty over the Plan will only be achieved on receipt of a binding Inspector's Report. In advance of that, Local Authorities will need to consider the evidence base and the background to policies when assessing development proposals.

- the key objectives of the emerging Vale LDP have not been properly articulated in the emerging land use planning policies, including:

- the LDP seeks to ensure new development is of a scale appropriate to its location, but the allocation of land to the East of St Nicholas could see the population of the village grow by 63%;

- despite seeking to minimise the need to travel, the proposed allocation is made at a settlement which only has services and facilities to meet local needs;

- The LDP seeks to protect and enhance historic environments, yet the allocation will have a detrimental impact on the St Nicholas Conservation Area;

- The LDP seeks to meet the housing needs of each community, yet there isn't an identified housing need in the East of the Vale.

- The application does not accord with emerging Planning Policy as:

- The access is inappropriately located;

- It would not provide the housing development and quantum of public open space required; and

- The development does not remedy deficiencies in children's play space.


- A number of recent Appeals have demonstrated that a shortfall in housing land or a time lapsed Development Plan does not lead to unsustainable development being considered as being acceptable.

- The proposed development does not accord with the key principles and policy objectives provided by PPW.

- It could have unacceptable impacts on community infrastructure.

- The proposed development would have an unacceptable detrimental impact on the St Nicholas Conservation Area.

Yours Sincerely,



Dr John Macneil.

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

Mr. S. Rennie,
Development Control,
The Vale of Glamorgan Council
Dock Office,
Barry Docks
Barry, CF63 4RT

14th November 2015.

Re: Your ref: P/DC/SR2/2015/00249/FUL.

Application No: 2015/00249/FUL/SR2 - Land to East of St Nicholas.

Dear Mr. S. Rennie,

Thank you for letter dated 27th October 2015 regarding the proposed development to the East of our property in St. Nicholas.

I am writing to you in order to register a number of objections to the aforementioned proposal - Land to East of St Nicholas.

The modified proposal does not address our concerns expressed in our correspondence of March 2105. The additional housing, now 96 from the original 79, plus the associated parking/cars on the 3.65 hectare site will only exacerbate the problems identified with the earlier version of this misguided proposal.

Attached is a detailed submission (TheCroft_JMacneil_2015_00249_FUL_SR2.pdf) . I would however like to summarise the key points from my perspective.

- The amended proposal does not constitute sustainable development.
 - Increase in size of St Nicholas by ~63%. Insufficient amenities exist in the village to support this development.
 - Substantial increase in car traffic to/from site onto the busy A48.
 - There is little demand for affordable housing in the Eastern Vale of Glamorgan.
- The proposed development is at variance with the emerging LDP and recent Welsh Government correspondence concerning the proposals for extensive

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16 NOV 2015

developments in St Nicholas & Bonvilston. (Welsh Government in their response to the Revised Deposit LDP, dated 20th December 2013.)

- Demolition of “Emmavalle” which lies within the St Nicholas Conservation Area and replacing it with an access point to the proposed development will have an adverse affect on the linear character of the village.
- Building on high quality agricultural land (grade 3a) is a poor use of this vital resource and degrades the appearance of the village.

We should be trying to provide affordable housing where it is needed with the necessary infrastructure/amenities while maintaining our green spaces and reducing our reliance on cars. The proposed development does not meet any of these objectives. I am therefore strongly opposed to the proposed development.

Yours Sincerely,



Dr John Macneil.

Attachment: TheCroft_JMacneil_2015_00249_FUL_SR2.pdf

Payne, Adrienne J

From: J.Macneil [REDACTED]
Sent: 15 November 2015 19:52
To: Planning & Transportation (Customer Care)
Cc: [REDACTED]
Subject: Mr Steven Rennie - P/DC/SR2/2015/00249/FUL
Attachments: TheCroft_JMacneil_14thNov15.pdf; TheCroft_JMacneil_2015_00249_FUL_SR2.pdf

Dear Mr Rennie,

I would like to object to the proposed development in St Nicholas - your reference P/DC/SR2/2015/00249/FUL. The attached documents explain why I feel that this development is not desirable.

Regards,

John Macneil

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D.E.E.R
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ACTION BY: SR2JMC
NO: 29
ACK:

Payne, Adrienne J

From: Planning & Transportation (Customer Care)
Sent: 15 November 2015 19:23
To: Planning & Transportation (Customer Care)
Subject: New comments for application 2015/00249/FUL
Attachments: TheCroft_SMCCurien_14thNov15.pdf; TheCroft_SMCCurien_2015_00249_FUL_SR2.pdf

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas
from Ms Sophie Curien [REDACTED]

Address:
The Croft, Cowbridge Road, St Nicholas, CF56SH

Comments:
I wish to register a number of objections to the aforementioned proposal. See attached documents.

The modified proposal does not address the concerns expressed in my correspondence of March 2105. The additional housing, now 96 from the original 79, plus the associated parking/cars on the 3.65 hectare site will only exacerbate the problems identified with the earlier version of this misguided proposal.

The following files have been uploaded:
TheCroft_SMCCurien_14thNov15.pdf
TheCroft_SMCCurien_2015_00249_FUL_SR2.pdf

Case Officer:
Mr. Steven Rennie

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16 NOV 2015

D.E.E.R
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ACTION BY: SR2/JMC
NO: 28
ACK:

Payne, Adrienne J

From: Rennie, Steven
Sent: 03 November 2015 08:22
To: Planning & Transportation (Customer Care)
Subject: FW: Application number 2015/00249/FUL/SR2 - land to the East of St Nicholas - Dr PE Williams objections

Letter to be registered for an application below

thanks

Steven Rennie
Senior Planner
Regeneration and Planning
Vale of Glamorgan Council / Cyngor Bro Morgannwg
tel / ffôn: [REDACTED]
e-mail / e-bost: [REDACTED]

Visit our Website at www.valeofglamorgan.gov.uk
ch i'n gwefan yn www.bromorgannwg.gov.uk

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From: Paul Williams [REDACTED]
Sent: 01 November 2015 14:46
To: Rennie, Steven
Subject: Application number 2015/00249/FUL/SR2 - land to the East of St Nicholas - Dr PE Williams objections

Mr Steven Rennie
Senior Planner
Planning and Transportation Services
Vale of Glamorgan Council / Cyngor Bro Morgannwg [REDACTED] [REDACTED]

Ger-y-Ilan
St Nicholas
CF5 6SY

Dear Mr Rennie

Application number 2015/00249/FUL/SR2 - land to the East of St Nicholas
Your ref: P/DC/SR2/2015/00249/FUL

Thank you for your letter dated 27 October 2015 regarding the above. Could you please record the following objections by me to the proposal to develop 96 houses at the above site, made with reference to the documents that have recently been made available on the VoG website:

1 Additional information Design and character appraisal

This document provides an overview of the context and character of St Nicholas village and other villages within the Vale of Glamorgan. It indicates clearly how the character of the existing houses and other amenities within the village of St Nicholas is completely different to the building proposed.

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ACTION BY: SR21JMC
NO: 12
ACK:

A The style and the density of the building proposed is completely out of proportion to everything else that surrounds it, indicating clearly that the proposed development of 96 houses on this small area vandalises the character of the village. It seeks to destroy the character of one of the best examples of traditional Vale of Glamorgan villages.

2 Design and access statement

The proposed destruction of Emmaville to provide access onto the A48 will create an unsightly gap. This document states that 'Prior to the review of the conservation boundary in 2009 the southern field of the application site together with the Ger-y-Llan development were included within the boundary of the Conservation Area but were subsequently excluded because the boundary review found that the field made no positive contribution to the special character of the conservation area and the modern development at Ger-y-Llan had no particular merit with little architectural or historic interest.'. I disagree with the statement for the reason that the field does indeed make a very positive contribution to the special character of the conservation area.

A Abutting this development to the conservation area will result in the rural character of the conservation area being destroyed by this disproportionate mass of modern housing placed immediately next to it, rather than the existing green field.

This document states that 'Planning Policy Wales (para 4.9.1) advises that land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development and either previously developed land or land in lower agricultural grades is unavailable. There is an overriding need for the development to meet on going housing requirements.'

B It is utterly untrue that there is an overriding need for the development to meet ongoing housing requirements. Please see my previous statements, based on Welsh government policy, that state clearly that there is no demand for housing in St Nicholas. I have previously made representations on the requirement for housing in the Vale of Glamorgan both in the context of this application and in the context of the LDP / UDP. I refer to the arguments and numbers that I have previously presented, that show clearly that there is no need for this development.

This document states that 'Vehicular and pedestrian access will be provided directly off the A48. .. The proposed access consists of a new priority T junction with the A48 to be located through the land occupied by the building named Emmaville which will be demolished. The new junction will introduce a right turn ghost island facility onto the A48 which will protect right turning traffic.'

C I and others have already argued that the creation of such access to this massive development at this point will create an accident black spot as (heavy) traffic already does not observe the 30 mph speed limit at this site.

This document states that 'The development will provide 96 houses of which 40% comprise affordable housing.'

D I have already argued in many previous submissions on this application and on the LDP / UDP application that there is according to the Welsh government's own figures absolutely no demand for affordable housing in St Nicholas.

3 Landscape and visual appraisal

This document seems to make out that there may be limited views of the proposed development and that that may not impact significantly on the nature and character of the village.

A After leaving the city of Cardiff and Culverhouse Cross travelling west, and immediately after entering the open countryside of the Eastern part of the Vale of Glamorgan, the first feature that the public will encounter is the existence of this large development. Rather than coming upon a village with the historic character of St Nicholas, they will encounter this entirely disproportionate development. This aspect has been ignored in this document.

4 Transport statement

Table to whether shows the walking time between the proposed development and some key amenities. The bus stops are 3 to 4 minutes' walk away whereas the nearest shops and are over 32-34 minutes' walk away.

A It is this obvious that for anyone to be able to live independently in this development, they will require a car in order to be able to transport shopping etc. It is thus inappropriate that there is such a high proportion of affordable housing proposed in this development, as all residents would have to have their own cars in order to be able to function at this location.

The document states that 'Whilst the retail parks at Culverhouse Cross are considered to be reasonable walk from the site, they are achievable distances on a bicycle. Furthermore, the site and Culverhouse Cross are connected via the frequent X2 bus service'

B I think it would be very dangerous to expect residents to cycle up the long, steep Tumble Hill whilst carrying bags of shopping or other articles from the retail parks at Culverhouse Cross. The X2 bus service is not frequent, occurring roughly every hour.

The document states that 'future residents could comfortably walk to a number of key local amenities, including the primary school, bus stops and Culverhouse Cross'

C The authors of this report have a strange notion of comfort, as they clearly think that a 32 - 34 minute walk in the rain in the winter, carrying back shopping up a steep hill is comfortable!

The document states that 'Figure 4 demonstrates that future residents could comfortably cycle to other local villages as well as key shopping and employment opportunities in northwest Cardiff. This offers future residents the opportunity to travel sustainably from the outset and reduce dependence on the private car.' It also states that 'The development will provide 183 resident spaces and 2 visitor spaces, which accords with the emerging VoG SPG Parking Standards'

D There are no dedicated cycle lanes in this area, and as a resident who drives daily to work at the University Hospital of Wales, I am acutely aware of the dangerous route that the A48 constitutes for cyclists, along its entire length. The notion that future residents could cycle to do their shopping and to go to work is frankly fanciful. The delusional nature of this notion is borne out by the provision of parking spaces for the above number of cars.

E The traffic on the A48 is already over capacity at the morning and evening rush hours. Evidence for this was presented at the public local enquiry into the trunking of the A48 some years ago. As the annual rate of traffic growth is about 5% per annum, the addition of nearly 200 cars to the A48 each morning (few people will cycle because of the danger involved and the utter impracticality of this) would severely exacerbate the already very congested A48.

I would be most grateful if you acknowledge receipt of this communication.

Yours faithfully
Dr Paul Williams

Payne, Adrienne J

From: Planning & Transportation (Customer Care)
Sent: 03 November 2015 09:29
To: Planning & Transportation (Customer Care)
Subject: New comments for application 2015/00249/FUL

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas
from Mr Peter Dewey [REDACTED]

Address:
Caia Farm, St Nicholas, CF5 6SG

Comments:

I have received a notification that amended plans etc. have been received relating to this application. However the development remains as a ridiculous unsustainable overdevelopment. Can I please receive confirmation that the objections I raised in my initial letter of objection remain in force? On the face of the letter I received from VOG, this amended application could be construed as an attempt to have all comments, objections received on the previous iteration of this development rendered ineffective, so can I also have confirmation that, as the development appears to be substantively the same as the initial application, all extant objections to the proposal will remain in force?

Case Officer:
Mr. Steven Rennie

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03 NOV 2015

D.E.E.R
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ACTION BY: SR2/JMC
NO: 14
ACK:

Rennie, Steven

From: Rennie, Steven
Sent: 05 November 2015 13:45
To: 'peter.dewey@gmail.com'
Subject: St Nicholas Planning Applications

Dear Mr Dewey

We received your objection to the revised proposals. However, all letters and emails received previously are still relevant to the proposals and will be taken into account. The new letters sent out are to notify people of the revised proposals which they can also comment on if they wish.

Regards

Steven Rennie
Senior Planner
Regeneration and Planning
Vale of Glamorgan Council / Cyngor Bro Morgannwg
Tel / ffôn: [REDACTED]
e-mail / e-bost: [REDACTED]

Visit our Website at www.valeofglamorgan.gov.uk
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Payne, Adrienne J

From: Rennie, Steven
Sent: 10 November 2015 09:37
To: Planning & Transportation (Customer Care)
Subject: FW: Application number 2015/00249/FUL/SR2 - land to the East of St Nicholas - Mr CL Williams objections

Objection letter received..

Steven Rennie
Senior Planner
Regeneration and Planning
Vale of Glamorgan Council / Cyngor Bro Morgannwg
tel / ffôn: [REDACTED]
e-mail / e-bost: [REDACTED]

Visit our Website at www.valeofglamorgan.gov.uk
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From: Chris Williams [REDACTED]
Sent: 10 November 2015 09:16
To: Rennie, Steven
Subject: Application number 2015/00249/FUL/SR2 - land to the East of St Nicholas - Mr CL Williams objections

Three Tuns

St Nicholas.

Vale of Glamorgan

CF5 6SY

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10 NOV 2015

Mr S Rennie

The Head of Planning.

The Vale of Glamorgan Council.

Dock Office

Barry Docks

Barry CF63 4RT

D.E.E.R
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ACTION BY: <i>Se2jmc</i>
NO: <i>20</i>
ACK:

Dear Mr Rennie,

Planning application by Redrow Homes (south Wales) limited – Land to the East of St Nicholas : Application number 2015/00249/FUL/SR2 - land to the East of St Nicholas

Your ref: P/DC/SR2/2015/00249/FUL

I refer to my previous objections and now wish to submit a further rejection of the above revised application on the following key grounds

- 1) Scale of the proposed development is disproportionate and conflicts with the representations by the Welsh Assembly to the Council relating to the DLP. In addition the proposal should be seen against the information there is a further 2 substantial planning applications for the same village which if all 3 approved would more than double the housing population.
- 2) The proposed development is out of character with the existing minor rural settlement and conflicts with the policies of the LDP and PPW.
- 3) The proposed application will substantially increase the vehicle traffic to the point where unless there is more significant road development there will be considerable traffic issues.
- 4) Regarding Sewage disposal there appears no plan for this and Welsh Water have stated that they are at capacity and would not be able to cope with this proposed development.
- 5) The application is pre-mature and should not be considered until the more important LDP has been considered by the Welsh Assembly appointed Inspector.
- 6) Transport statement in the application is utterly and plainly wrong to even a casual observer. It is ridiculous to put forward a case that residents will walk and cycle to Culverhouse Cross. It is an extremely steep long hill and extremely unrealistic to think anyone would make that journey and bring back shopping. One can only conclude that each house proposed would have at least 1.5 cars bringing an extra c 150 cars commuting along the A48.

Regards

Chris Williams

Payne, Adrienne J

From: Tim Knowles [REDACTED]
Sent: 06 November 2015 15:03
To: Planning & Transportation (Customer Care)
Subject: Fw: Planning Application 2015/00249 - St Nicholas - Redrow Homes - Website Documents

Dear Sirs

Please let me have your reply to my e-mail on 2 November 2015.

Yours faithfully

Tim Knowles

From: Tim Knowles
Sent: Monday, November 2, 2015 10:48 AM
To: Vale of Glamorgan Council - Development Control
Subject: Planning Application 2015/00249 - St Nicholas - Redrow Homes - Website Documents

Dear Sirs

I acknowledge receipt on 31 October 2015 of your letter dated 27 October 2015 under reference P/DC/SR2/2015/00249/FUL concerning amendments to the above planning application.

On checking the Documents section relating to this planning application on your website in order to consider the appropriate representations to be made, I have been confused concerning the availability of documents. I would be grateful to receive clarification.

Having checked your website on a number of occasions in the last seven months, there were only three pages listing documents until sometime in the last two weeks. There are now nine pages including some amended and new documents submitted by the applicants. The list also includes some objections by local residents dated from 27 March 2015 onwards but not previously appearing on your website. The addresses of some of the residents who have objected are repeated in the latest list up to six times (eg 2 Button Ride). There is nothing in the list to indicate the distinction between the various entries for the same address. On looking at some of the documents in the list (eg the third entry on page 4 for Village Farmhouse), I have found that it comprises a comment form which contains only the first few lines of the letter of objection. There are two sets of documents shown below but, on clicking either set, nothing is available to
w.

In spite of the numerous entries on the list some some properties, my letters of objection dated 26 March 2015 and 25 August 2015 and my wife's letter dated 9 April 2015 have not been included in the list. Why have my objections been ignored? What criteria has been applied by the Council in determining which objections shall be published and which shall be ignored?

Yours faithfully

Tim Knowles

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09 NOV 2015

D.E.E.R
RECEIVED
ACTION BY: SR2/JMC
NO: 4
ACK:

Rennie, Steven

From: Planning & Transportation (Customer Care)
Sent: 09 November 2015 17:29
To: Tim Knowles
Subject: RE: Planning Application 2015/00249 - St Nicholas - Redrow Homes - Website Documents

Dear Mr Knowles

Thank you for your email dated 2 November 2015.

Firstly may I confirm that we have received the following letters of objection and these are placed in hard copy on the planning file :

- Letter from Mr T Knowles dated 26 March 2015 in relation to planning applications 2015/00249/FUL and 2015/00283/CAC, received by this department on the 27 March 2015
- Letter from Mrs G Knowles dated 9 April 2015 in relation to planning application 2015/00249/FUL, received by this department on the 10 April 2015
- Letter from Mr T Knowles dated 25 August 2015 in relation to applications 2015/00249/FUL and 2015/00283/CAC, received by this department on 27 August 2015

In relation to your query as to why not all letters of objection are available to view on the planning register:

Objections that are received via the planning register are automatically added to the electronic application and the planning officer will then upload it on to the website for public viewing if appropriate. Unfortunately, objections received via letter or via email are not automatically added to the electronic planning record and as such are placed in hard copy on the physical planning file. I can assure you that these and all objections received are fully considered by the planning officer.

I trust that I have answered your questions, however, if you have any further questions please do not hesitate to respond to this email.

Yours sincerely

Fiona Lambert
Business Support Manager
Director's Office - Development Services
Vale of Glamorgan Council / Cyngor Bro Morgannwg

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Ewch i'n gwefan yn www.bromorgannwg.gov.uk

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Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

From: Tim Knowles [REDACTED]
Sent: 02 November 2015 10:48
To: Planning & Transportation (Customer Care)
Subject: Planning Application 2015/00249 - St Nicholas - Redrow Homes - Website Documents

Dear Sirs

I acknowledge receipt on 31 October 2015 of your letter dated 27 October 2015 under reference P/DC/SR2/2015/00249/FUL concerning amendments to the above planning application.

On checking the Documents section relating to this planning application on your website in order to consider the appropriate representations to be made, I have been confused concerning the availability of documents. I would be grateful to receive clarification.

Having checked your website on a number of occasions in the last seven months, there were only three pages listing documents until sometime in the last two weeks. There are now nine pages including some amended and new documents submitted by the applicants. The list also includes some objections by local residents dated from 27 March 2015 onwards but not previously appearing on your website. The addresses of some of the residents who have objected are repeated in the latest list up to six times (eg 2 Button Ride). There is nothing in the list to indicate the distinction between the various entries for the same address. On looking at some of the documents in the list (eg the third entry on page 4 for Village Farmhouse), I have found that it comprises a comment form which contains only the first few lines of the letter of objection. There are two sets of documents shown below but, on clicking either set, nothing is available to view.

In spite of the numerous entries on the list some some properties, my letters of objection dated 26 March 2015 and 25 August 2015 and my wife's letter dated 9 April 2015 have not been included in the list. Why have my objections been ignored? What criteria has been applied by the Council in determining which objections shall be published and which shall be ignored?

Yours faithfully

Tim Knowles

Payne, Adrienne J

From: [REDACTED]
Sent: 08 November 2015 19:49
To: Planning & Transportation (Customer Care)
Subject: PLANNING APPLICATION: 2015/00249/FUL/SR2
Attachments: M P A O'HAGAN OBJECTION TO APPLICATION 2015-00249-FUL-SR2 dated 8 Nov 15.docx

For The Attention of Mr Steven Rennie:

Please see attached my representations concerning the subject planning application.

I would be grateful if you would be kind enough to acknowledge receipt of this e-mail.

RECEIVED

09 NOV 2015

D.E.E.R
RECEIVED
ACTION BY: SR21JMC
NO: 25
ACK:

Beech House
Well Lane
St Nicholas
CF5 6SG

8 November 2015

Mr Steven Rennie
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

RECEIVED

09 NOV 2015

Dear Mr Rennie,

SUBJECT: PLANNING APPLICATION 2015/00249/FUL/SR2 BY REDROW HOMES (SOUTH WALES) LTD – LAND TO THE EAST OF ST NICHOLAS – DEVELOPMENT OF 96 HOUSES AND ASSOCIATED OPEN SPACE, VEHICULAR AND PEDESTRIAN ACCESS, LANDSCAPING AND INFRASTRUCTURE INCLUDING THE DEMOLITION OF 'EMMAVILLE' (YOUR REFERENCE: P/DC/SR2 2015/00249/FUL)

I wish to object to the above planning application on the following grounds:

1. THE APPLICATION IS PREMATURE:

The Deposit Local Development Plan (LDP) is still being processed by the Vale of Glamorgan Council (VOGC) and, **more importantly, is subject to an independent examination by the Planning Inspectorate of Wales.** I and other residents of St Nicholas have previously registered objections to the LDP because of the flawed nature of the Plan. To my knowledge, these objections have yet to be addressed by VOCC and I am not aware that they have, in their totality, been made available to the Welsh Planning Inspectorate. The land to the east of St Nicholas, the subject of this planning application, forms an element of the allocated site number MG2(43) which should be deleted from the LDP on the grounds set out in my and others' objections to the LDP. Irrespective of the legal loopholes Redrow is seeking to exploit by submitting the subject application at this time, clearly, it would be an outrageous abuse of due process for planning permission to be granted for the Site in advance of appropriate consideration of the representations by the Council and the Inspector prior to eventual adoption of the LDP, which could well be amended following the Planning Inspectorate of Wales independent examination. For VOGC planning officers to give permission for this planning application to proceed would make a mockery of the planning process in that the constitutional objections would be ignored before due consideration by the Inspector. This application is premature and out of order because it has been submitted when consideration of the LDP is still

ongoing. Furthermore, the application should not be considered as the site forms part of MG2(43) which should be deleted from the LDP, as suggested by numerous objectors, whose objections should, constitutionally, be under consideration at present.

As has been confirmed by the Council in a pre-application response to Harmers Limited dated 5 February 2014 (Ref: P/DC/SR2/2013/0200/PRE) no deficiency now exists in the Council's five year housing land supply. Thus, there is no justification for bringing forward the Site based on its inclusion as part of an allocated site in advance of formal adoption of the LDP, as revised following completion of all due processes.

2. SCALE OF PROPOSED DEVELOPMENT:

The Application relates to 96 new houses, of which 40% would be affordable - a development which would be hugely out of proportion to the size of the existing village of St Nicholas, much of which is in a Conservation Area.

The core village of St Nicholas has 144 houses of which 77 are on the north side of the A48, which runs through the centre of the village, and 67 houses on the south side. Of the 144 houses, 105 houses are in the post-2009 Conservation Area, 32 houses were in the pre-2009 Conservation Area but excluded in 2009 and 7 houses are located between the Conservation Area and the commencement of the 30 mph speed limit at the western end of the village.

A development of 96 houses would increase the size of the core village by approximately 67% and the north side by in excess of 120%. This represents a huge scale of development for a small rural settlement.

In its representations to the VOGC on the LDP, the Welsh Assembly Government (WAG) stated 'Allocations in some minor rural settlements, for example, 100 units at St Nicholas and 120 units at Bonvilston appear disproportionate to current services and facilities' (paragraph B.1(d) of the Annex to the letter dated 20 December 2013 under the Council's reference P/POL/AMW/LDP3).

The foregoing shows that the scale of the proposed development is wholly disproportionate to the size of the current village.

3. URBANISATION OF OPEN COUNTRYSIDE:

Paragraph 4.10.1 of Planning Policy Wales dated July 2014 (PPW) states: 'considerable weight should be given to protecting agricultural land of grades 1, 2 and 3A from development because of its special importance. Land in these grades 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...'. There is no overriding need for housing development, particularly affordable housing, in St Nicholas or the East Vale (designated in Figure 1.1 of the *Local Housing Market Assessment 2013*) (LHMA) as confirmed in Table 6.13 of the document. Any need

for housing elsewhere in the Vale of Glamorgan could be provided on brownfield land (eg Llandow) or land of lower agricultural grade.

The proposed site allocation on grade 2 (or grade 3A) agricultural land conflicts with paragraph 4.10.1 of PPW.

4. THE PROPOSED DEVELOPMENT IS OUT OF CHARACTER WITH THE EXISTING MINOR RURAL SETTLEMENT:

St Nicholas is a minor rural settlement in the Vale of Glamorgan which has evolved gradually over many centuries. The Deposit plan written statement November 2013 states, on pages 95–97 under Policy MD2 that proposals should 'Respond appropriately to the local context and character of neighborhood buildings in terms of type, form, scale, mix and density. This planning application exceeds, grossly, the density in the adjacent Conservation Area.

This is an urban degree of density that is completely out of context with the existing village and Conservation Area – one that would permanently ruin its character and amenity. This planning application directly contravenes policy MD2.

It is claimed, wrongly, at paragraph 2 of the Planning Statement that there is no planning history for the proposed site. However, 2 planning applications for house construction on part of the site were refused by VOGC - 10 January 1989 for the construction of 10 houses and on 22 May 1991 for the construction of 6 houses (ref 1988/01152/OUT). **The grounds for refusing permission for the construction of 6 or 10 houses apply even more to the proposed construction of 96 houses.**

In its representations to VOGC on the LDP, the WAG stated that 'Allocations in some minor rural settlements, for example, 100 units at St Nicholas and 120 units at Bonvilston **appear disproportionate to current services and facilities.**' (paragraph B.1(d) of the Annex to the letter of 20 December 2013, VOGC reference P/POL/AMW/LDP3). **The scale of developed in this application is wholly disproportionate to the size of the current village.**

Such development would not be of an appropriate scale and density for its location and it would not make a positive contribution to the local environment **contrary to paragraph 7.5 of the LDP.** Such development would not be '..of a scale appropriate to its location' **contrary to paragraph 4.5 of the Deposit LDP.**

The proposed site is adjacent to, and any development would impact directly on, 6 remaining houses (following the proposed demolition of Emmaville) on the north side of the A48, 8 houses on the east and north sides of Ger-y-Llan and one house in Well Lane. The proposed main access to the site would have a very serious impact on the adjacent properties Kingfauns and Green Meadow. The proposed development would have a serious adverse impact for these properties on the existing residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance **contrary to paragraph 7 of Policy MD 2 and paragraph 4 of Policy MD 3.**

The properties on the north side of the A48 form part of the Conservation Area of St Nicholas. Most of the directly affected houses occupy plots substantially larger than the proposed dense development of houses which includes access, roads and other common facilities. Similarly, the adjacent houses in Ger-y-Llan and Well Lane have a substantially lower density. **The proposed development is contrary to paragraph 2 of Policy MD 2.**

The proposed development of the site would seriously erode the architectural and historical significance of St Nicholas and would, clearly, contradict the VOGC's policy for conservation areas which directs that a conservation area is an area of special architectural or historic interest, the character or appearance of **which it is desirable to preserve or enhance**. The Council has a duty to identify areas within the Vale of Glamorgan that have a character worthy of protection and to designate them as conservation areas.

The proposed development would intrude into open country and would result in a loss of agricultural land. There would be a narrowing of the green gap between Cardiff and St. Nicholas and a significant and unnecessary increase in urbanization.

The scenic approach into St. Nicholas from the east would be significantly impaired. Furthermore, the proposed development of the allocated land on the scale envisaged would mean that St Nicholas would no longer be an attractive 'Gateway' to the beautiful Vale of Glamorgan and a welcoming transition from the sprawling urbanization of Cardiff.

Paragraph 4.7.8 of PPW states 'All new development should respect the character of the surrounding area and should be of appropriate scale and design'. For reasons described in this paragraph and paragraph 5 below, the proposed development at the entrance to the conservation area of St Nicholas **does not comply with paragraph 4.7.8 of PPW.**

In summary, the proposed development of the Site would be contrary to paragraphs 2 and 7 of Policy MD 2, paragraphs 2 and 4 of Policy MD 3 and paragraph 4.7.8 of PPW. St Nicholas does not have the capacity to accommodate this proposed development without its having an unacceptable effect on its character **contrary to paragraph 5.44 of the LDP.**

5. DEVELOPMENTS WITHIN MINOR RURAL SETTLEMENTS:

Contrary to Policy MD 6 – 'Development within Minor Rural Settlements', the relative scale and density of the proposed development substantially **conflicts with Policy MD 6**. It would not have a distinct visual relationship with the existing settlement (contrary to paragraph 1); it would not be of a scale and character that is sympathetic to and respects its immediate setting and wider surroundings (contrary to paragraph 2); it would have an unacceptable impact on the character and appearance of the [existing] settlement (contrary to paragraph 3); it would represent a visual intrusion into the countryside (contrary to paragraph 4); and it would not be consistent with Policies MD 2 and MD 3 (contrary to paragraph 8).

6. SERVICES AND FACILITIES:

St Nicholas has a church, chapel, primary school, church hall, post box and a half-hourly bus service (substantially less frequent in the evening and on Sunday - not properly reflected in paragraph 2.17 of the Transport Statement) to Cardiff and Cowbridge (and beyond). The bus service is infrequent and expensive. It is unlikely to be used for most journeys to Culverhouse Cross or Bonvilston.

St Nicholas does not have a post office, shop, doctor's surgery, nursery, public house, restaurant, leisure centre nor library. The absence of these facilities will inevitably result in the need for the residents of the new houses to make frequent short car journeys to shops 1.5 miles away at Culverhouse Cross or to a shop, public house or restaurant over 2 miles away at Bonvilston. The nearest doctors' surgeries are in Ely (2.2 miles) and Cowbridge (6 miles). The nearest post office is in Wilson Road, Ely (2.8 miles). It is unrealistic to expect these journeys to be made by walking or cycling by the vast majority of the new residents, particularly the elderly. The return journey from Culverhouse Cross involves climbing the long steep hill known as The Tumble.

The absence of these frequently used services in the village and the consequent necessity to make frequent short car journeys is **contrary to Objective 3 and to the objective expressed in paragraph 7.12 of the LDP.**

7. AFFORDABLE HOUSING:

The application includes provision for 38 affordable housing units. The area objectives (paragraph 5.22 of the LDP) include the provision in Minor Rural Settlements of '.. affordable rural housing to meet local need.' While the need for affordable housing in the Vale of Glamorgan, particularly in urban areas with adequate local services, is not questioned, the net local need for affordable housing in St Nicholas and the East Vale does not exist, as confirmed by Table 6.13 of the LHMA. It is also reflected in the lowest priority area attributed to the East Vale in paragraph 5.47 of the LDP.

As stated at paragraph 6 above, there is an absence in St Nicholas of those services (particularly a shop, post office and doctor's surgery) which would be frequently required by residents of affordable houses. Even with subsidised prices, it is probable that a new affordable house in St Nicholas would cost as much as or more than a similar property in the west side of Cardiff (say, Culverhouse Cross or Ely) or in the Key and Service Centre Settlements in the Vale of Glamorgan (identified in paragraph 5.14 of the LDP) where essential local services are available nearby. Consequently, the cost of living in St Nicholas would be greater due to transport costs and far less convenient for residents of those houses.

The main location with a need for affordable housing is Barry followed by Coastal and Penarth (Figure 1.1 and Table 6.13 of the LHMA). The distance from St Nicholas to the nearest settlements in any of these locations exceeds five miles and most parts substantially exceed this distance. If affordable houses are built in St Nicholas,

where there is no need, residents of the Vale requiring such houses will have to move away from their current locations which have all relevant local services as well as their families and established friends. There is no direct bus service from St Nicholas to Barry, Coastal or Penarth. In order to maintain essential and desirable links with their families and communities, these residents (if they possess cars) will need to make frequent car journeys **contrary to Objective 3 and to the objective expressed in paragraph 7.12 of the LDP.**

The proposed development does not possess or have good access to a wide range of services and facilities **contrary to paragraph 7.53 of the LDP.**

8. VILLAGE ROAD CAPACITY:

The proposed development would have major consequences on A48 traffic. The centre of the village is frequently packed with parked cars, particularly at school times and this already presents great danger to children and adults. The roads are very narrow and lack pavements - indeed it is often the case that cars have to reverse in order to pass in opposite directions.

The addition of a substantial number of cars entering and leaving the A48 at St Nicholas would cause substantial further disruption, delay and possible danger in a situation that is already very close to gridlock.

9. MAIN ACCESS TO THE SITE:

The location of the proposed access to the Site is inside the Conservation Area and some distance to the west of that proposed in MG 2-43. Paragraphs 3.10 to 3.13 of the Transport Statement set out proposals for changes to the highway layout near the access to the Site. The A48 from Culverhouse Cross is derestricted for 1.1 miles as far as the eastern end of the village then has a 30 mph speed limit through St Nicholas commencing only 100 metres from the access to the Site. Figure 9 and Appendix F of the Transport Statement do not indicate any proposal to extend the 30 mph limit further east. Whether or not there is any extension, traffic from the east frequently enters St Nicholas outside peak periods at speeds much greater than 30 mph. Traffic leaving the Site to turn west towards Cowbridge would experience difficulty and danger due to the traffic flow in both directions.

At peak periods, it would be difficult for the significant number of vehicles leaving the proposed development to enter the traffic flow in either direction, thus causing a tailback within the proposed site.

Experience of leaving School Lane (eastern exit) to travel in either direction at peak periods demonstrates the extent of the problem even though it is substantially mitigated by being in the centre of the restricted speed zone and having the intermittent benefit and protection of the traffic lights turning red at the adjacent junction with Duffryn Lane. This forces through traffic to stop and provides the opportunity for vehicles from School Lane to enter the traffic flows. These mitigating factors would not apply to traffic exiting the Site.

Furthermore, considerable additional problems affecting traffic flow on the A48 will arise during the construction period lasting at least two years.

10. PEDESTRIAN AND CYCLE ACCESS TO THE SITE:

Section 7 of the Design and Access Statement states that: 'Footpath and cycle paths will be incorporated within the layout to link with existing housing to the west and south.....'.

The occupants of 11, 12 and 14 Ger-y-Llan require the Estate Road for access to these properties and have an obligation to pay a fair and reasonable share of the costs of maintenance and repair of the Estate Road. No approach has been made by or on behalf of Redrow to the owners of these 3 properties concerning the proposed use of the Estate Road.

The use of Ger-y-Llan and the Estate Road by the residents of 96 properties for pedestrian and cycle access to the proposed site is inappropriate; such use would have a considerable impact on the amenity of the residents of Ger-y-Llan, particularly the residents of the properties 11, 12 and 14.

There is also a risk that the Estate Road will be used by residents of and visitors to the Site for unauthorised parking. The tarmac section of the Estate Road is not wide enough for parking without causing considerable difficulty to the residents of numbers 11, 12 and 14 in entering and leaving those properties.

The proposed pedestrian and cycle route to the centre of the village and, particularly, to the school is unsuitable and very dangerous for young children

11. HIGHWAYS AND TRAFFIC CONGESTION:

Section 4 of the Transport Statement seeks to demonstrate that the proposed development will have little impact on traffic travelling on the A48. This is disputed for reasons set out at paragraphs 8 and 9 above. Of greater impact will be the cumulative effect of this proposed development together with other developments proposed in the LDP near Cowbridge (including Ystradowen and Colwinston) and between Cowbridge and Culverhouse Cross (including Bonvilston). In addition to these proposed developments, there are other significant proposed changes which will increase the traffic on the A48 and at the Tesco junction and Culverhouse Cross roundabout.

The subject application relies on the inclusion of the proposed site as part of an allocated site in the LDP. It is contended that this allocation, in combination with the other allocations referred to above, has been made without due consideration and regard by the Council to the cumulative effect on traffic on the A48. In particular, it is contended that, in formulating the LDP and determining site allocations at St Nicholas and Bonvilston, the Council has very seriously misinformed itself concerning the capacity of the A48. This capacity has been calculated at three points between Cowbridge and Culverhouse Cross, all of which are in the national 60 mph speed limit. No account has been taken of the 40 mph speed limit from West Bonvilston to West St Nicholas; the 30 mph speed limit through St Nicholas; and the

inevitable delays at the traffic lights at Sycamore Cross and Duffryn Lane as well as at other uncontrolled junctions.

12. CONCLUSIONS:

At well attended public meetings in St Nicholas on 19 March 2012 and 2 December 2013, plans to allocate land to the East of St Nicholas for housing development were opposed unanimously. More recently, on 22 and 26 March 2015, there was unanimous and well informed opposition to the earlier planning application for 79 dwellings at packed public meetings.

This amended application conflicts with many policies as indicated above and has multiple basic flaws. It is out of order and in breach of UDP policies. This planning application cannot rely on inclusion of the site as part of MG 2 (43) until my objections and those of others to the site's inclusion in the LDP have been properly considered by the VOGC and the Planning Inspectorate Wales prior to adoption of a revised LDP, as is the clear wish of the Welsh Government.

For the above reasons, I object to this planning application and ask that the VOGC refuses planning permission for this application and any other relating to all or part of MG 2 (43) prior to the formal adoption of the revised LDP following the Planning Inspectorate Wales decision on the soundness of the revised LDP.

Yours sincerely

Mr M P A O'HAGAN



Payne, Adrienne J

From: Rennie, Steven
Sent: 09 November 2015 11:30
To: Planning & Transportation (Customer Care)
Subject: FW: Planning Application 2015/00249 - Land to the East of St Nicholas
Attachments: 151109 - letter of objection - revised application.pdf

Objection letter

Steven Rennie
Senior Planner
Regeneration and Planning
Vale of Glamorgan Council / Cyngor Bro Morgannwg
tel / ffôn [REDACTED]
e-mail / e-bost: [REDACTED]

Visit our Website at www.valeofglamorgan.gov.uk
Ewch i'n gwefan yn www.bromorgannwg.gov.uk

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Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

From: Tim Knowles [REDACTED]
Sent: 09 November 2015 11:13
To: Rennie, Steven
Subject: Planning Application 2015/00249 - Land to the East of St Nicholas

Dear Mr Rennie

I am attaching a copy of my letter to you dated today setting out my further objections to the above planning application.

Please let me have the information requested at item J of the letter. I am also awaiting a response to the e-mails sent to the Development Control Department of the Council on 2 and 6 November 2015 concerning documents on the Council's website relating to the above planning application.

 ards

Tim Knowles

RECEIVED

09 NOV 2015

D.E.E.P
RECEIVED
ACTION BY: SR2/JMC
NO: 36
ACK:

CAE FFYNNON, 12 GER-y-LLAN, St NICHOLAS, CARDIFF, CF5 6SY

Telephone: [REDACTED]

E-mail: [REDACTED]

COPY BY E-MAIL - [REDACTED]

Your refs.: 2015/00249/FUL/SR2 & P/DC/SR2/2015/00249/FUL

9 November 2015

Mr Steven Rennie
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

Dear Mr Rennie

Planning Application by Redrow Homes (South Wales) Limited - Land to the East of St Nicholas

I acknowledge receipt on 31 October 2015 of a letter dated 27 October 2015 notifying me that amended plans and documents have been submitted by or on behalf of Redrow Homes (South Wales) Limited ("Redrow") in revision of the above planning application dated 6 March 2015 ("the Original Application") relating to land to the east of St Nicholas ("the Site").

Please refer to my letters dated 26 March and 25 August 2015 objecting to the Original Application. The many objections set out in my earlier letters remain for your consideration. In many cases, my objections apply to a significantly greater extent in respect of the revised proposal to construct 96 houses ("the Revised Application") compared with the Original Application for 79 houses. Please consider this letter in addition to my earlier letters

I wish to make the following additional representations and objections in the light of the Revised Application:

- A. Scale of proposed development. Please refer to item 3 of my letter dated 26 March 2015 which demonstrated that the original proposed development of 79 houses would increase the size of the core village of St Nicholas by 55% and the north side by 103%. Incredibly, the Revised Application proposes to increase the number of new houses to 96. This would increase the size of the core village by 67% and the north side by 125%.

RECEIVED

09 NOV 2015

CAE FFYNNON, 12 GER-y-LLAN, St NICHOLAS, CARDIFF, CF5 6SY

Telephone: [REDACTED]

E-mail: [REDACTED]

COPY BY E-MAIL - [REDACTED]

Your refs.: 2015/00249/FUL/SR2 & P/DC/SR2/2015/00249/FUL

9 November 2015

Mr Steven Rennie
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

D.E.E.R
RECEIVED
ACTION BY: Jmc/ser
NO: 14
ACK:

Dear Mr Rennie

Planning Application by Redrow Homes (South Wales) Limited - Land to the East of St Nicholas

I acknowledge receipt on 31 October 2015 of a letter dated 27 October 2015 notifying me that amended plans and documents have been submitted by or on behalf of Redrow Homes (South Wales) Limited ("Redrow") in revision of the above planning application dated 6 March 2015 ("the Original Application") relating to land to the east of St Nicholas ("the Site").

Please refer to my letters dated 26 March and 25 August 2015 objecting to the Original Application. The many objections set out in my earlier letters remain for your consideration. In many cases, my objections apply to a significantly greater extent in respect of the revised proposal to construct 96 houses ("the Revised Application") compared with the Original Application for 79 houses. Please consider this letter in addition to my earlier letters

I wish to make the following additional representations and objections in the light of the Revised Application:

- A. Scale of proposed development. Please refer to item 3 of my letter dated 26 March 2015 which demonstrated that the original proposed development of 79 houses would increase the size of the core village of St Nicholas by 55% and the north side by 103%. Incredibly, the Revised Application proposes to increase the number of new houses to 96. This would increase the size of the core village by 67% and the north side by 125%.

RECEIVED

10 NOV 2015

ENVIRONMENTAL
AND ECONOMIC
REGENERATION

However, the proposal becomes even more ludicrous and outrageous when viewed in the context of the two other planning applications for major developments at St Nicholas (2015/00662 by Waterstone Homes Limited ("the Waterstone Application") and 2015/00689 by Trehill Homes Limited ("the Trehill Application")) currently being considered by the Vale of Glamorgan Council ("the Council"). The Waterstone Application proposes 20 houses adjacent to the proposed Redrow development on the north side and the Trehill Application proposes 62 houses on the south side at the western end of the village. Thus, the total of new houses proposed is 178 which, if approved, would increase in size of the village by 124%. The north side would be increased by 151%.

The scale of the proposed development by Redrow alone is wholly disproportionate to the size of the current village. This proposed development conflicts with the representations by the Welsh Assembly Government to the Council relating to the Deposit Local Development Plan ("the LDP") quoted in my letter dated 26 March 2015.

- B. Urbanisation of open countryside. Please refer to the second paragraph of item 4 of my letter dated 26 March 2015. St Nicholas is a small rural village which has developed slowly over many centuries. An increase of 67% by the proposed Redrow development alone **conflicts with paragraph 4.7.8 of *Planning Policy Wales* ("PPW")** and clearly does not constitute a "minor extension" of the village. The whole character of this ancient village would be destroyed by this proposed development irrespective of the other proposed developments by Waterstone and Trehill.
- C. Out of character with existing minor rural settlement. Please refer to item 5 of my letter dated 26 March 2015. The density now proposed for the Redrow development of 96 houses on 3.65 hectares is 26.3 houses per hectare. This compares with densities of 5.9 houses per hectare in the post-2009 Conservation Area; 4.4 houses per hectare in the pre-2009 Conservation Area; and 9.3 houses per hectare in Ger-y-Llan. All of the comments and objections at item 5 of my letter dated 26 March 2015 based on the Original Application for 79 houses apply to an even greater extent in respect of the Revised Application for 96 houses.

A brief examination of the amended Site Plan dated 6 October 2015 clearly demonstrates the contrast between the sizes of the individual plots in the proposed development and those of the adjacent properties on the north side of the A48 and in Ger-y-Llan.

The proposed development **conflicts with the policies in the LDP and in PPW**, as set out at item 5 of my letter dated 26 March 2015.

- D. Services and facilities. Please refer to item 7 of my letter dated 26 March 2015 which drew attention to the absence in St Nicholas of the essential and basic services and facilities of a post office, shop, doctor's surgery, nursery, public house and restaurant as well as a leisure centre and library. The Amended Design and Access Statement ("the Access Statement") (section 6 on page 12) and the Amended Transport Statement ("the Transport Statement") both dated October 2015 make grossly unrealistic claims regarding access to these services and facilities by walking, cycling and the X2 bus service.

All distances to the nearest services quoted in the Access Statement and the Transport Statement are from either the main A48 access to the Site or from the proposed gate at the west of the Site (see item G below). However, parts of the proposed development are up to 350 metres from these access points. The distances to reach the access points should be added to the distances quoted in the Access Statement and the Transport Statement in assessing the reality of the claims regarding walking (including to the bus stops) and cycling.

The expectations expressed in paragraphs 2.4, 2.5 and 2.12 of the Transport Statement that residents will walk or cycle to the various local amenities listed in Table 2.1 (particularly those at Culverhouse Cross which has the nearest shops) have no relationship with the real world. Having lived in St Nicholas for nearly forty years, I am fully aware that it is extremely rare for a resident to walk or cycle to the shops at Culverhouse Cross. It is incomprehensible to expect that residents (unless young and very fit) would walk or cycle then return with heavy and bulky shopping climbing the long and steep Tumble Hill.

Paragraph 2.16 of the Transport Statement summarises the X2 bus service from St Nicholas to Culverhouse Cross and Cardiff to the east and to Cowbridge, Bridgend and Porthcawl to the west. While there is a half-hourly (or better) service to the east from 07.12 until 18.54 from Monday to Saturday, there are only three buses after 18.54. The return fare from St Nicholas to Culverhouse Cross is £5.60. Few residents of the proposed Redrow development are likely to use the bus service to do necessary shopping at Culverhouse Cross or beyond.

In summary, almost all of the residents of the proposed Redrow development would not walk or cycle or use the bus service to reach the essential local amenities. They would make frequent car journeys **contrary to Objective 3 and to the objective expressed in paragraph 7.12 of the LDP.**

Figure 2 in paragraph 2.6 of the Transport Statement illustrates that there is no employment available in St Nicholas and any employment available in the Culverhouse Cross area is in the retail sector (not suitable for all). Figure 2 also demonstrates that there is no public house in St Nicholas - the nearest is 2.8 km in Bonvilston. There is a minimal evening bus service from St Nicholas to Bonvilston and return. Residents of the proposed Redrow development would be unlikely to walk or cycle. They would travel by car to a public house or restaurant contrary to the above objectives and with the limitations and risks associated with drinking and driving.

- E. Village road capacity. Please refer to item 10 of my letter dated 26 March 2015. Paragraphs 2.9 and 2.10 and Photograph 2 of School Lane in the Transport Statement provide a wholly misleading impression of the safety of the narrow roads in the centre of the village and leading to the school. School Lane to the north of the church is particularly hazardous. I do not know when the photograph was taken but it must have been on the only occasion in the last few years when there were no vehicles parked alongside the church wall. Almost the whole time during the day and night, there are several vehicles (including a camper van) parked alongside the wall and, particularly dangerously, on the north east corner obscuring visibility for vehicles turning right towards the A48. Larger vehicles (including service vehicles and lorries) have great difficulty manoeuvring along this road. When any vehicle is travelling along School Lane to the north of the church, there is no room for pedestrians or cyclists, let alone wheeled transportation for young children or the disabled. Please see photographs number 4 & 7 in Appendix D of my letter dated 26 March 2015.
- F. Main access to Site. Please refer to item 11 of my letter dated 26 March 2015. A number of additional issues arise from the Revised Application:
- a. Paragraph 3.20 of the Transport Statement seeks to justify the construction of two access roads from the A48 within about 72 metres of each other to the Site and to the proposed Waterstone development, respectively. One access road would cause significant problems. The proposal for two access roads can only be described as ludicrous.
 - b. Emmaville is a substantial well maintained domestic property forming part of the Conservation Area of St Nicholas. Its proposed demolition to provide an unsightly access road within the Conservation Area would constitute an act of vandalism. The location of this proposed access road would also cause considerable disruption to the enjoyment and amenity of the residents of the adjoining properties of Green Meadow and Kingfauns.
 - c. The proposed access road is situated partly opposite the Old Police Station which is currently occupied by the business known as Angels Care Services Limited. Its website states that it has over seventy carers. Inevitably, this business generates a significant number of vehicle movements each day entering or leaving the premises. Frequently, the available parking within the grounds is full and vehicles are parked on the A48 or outside the premises, almost directly opposite the proposed access road. If the proposed access to the Site were approved, vehicles from the west turning right into the Old Police Station or turning right towards the east to exit would be obliged to cross both the main west bound traffic lane of the A48 and the proposed right turn lane. This would create another accident waiting to happen.
 - d. Paragraph 3.13 of the Transport Statement proposes the removal of the lay-by situated in front of Green Meadow. The lay-by serves a necessary purpose - to provide the facility for vehicles (frequently including service or delivery vehicles) to stop away from the busy A48. As there would be no other place to stop if the lay-by were removed, these vehicles would be obliged to stop on the main carriageway, often for lengthy periods in the case of service vehicles.

- e. Section 6 of the Access Statement and paragraphs 3.8 & 3.9 of the Transport Statement describe the provision of a ghost island facility to assist traffic turning right into the proposed access road. I do not question the benefit this would provide to traffic from the east whether through traffic or turning into the Site. However, this does not address the issue of traffic exiting the Site to turn right towards the west. Any such traffic would have to cross both the east bound lane of the A48 and the right turn lane before joining the traffic flowing west on the A48. This would not only be dangerous but, at peak periods, would delay other traffic exiting the Site whether turning right or left.

I strongly dispute the theoretical calculations in paragraph 4.10 of the Transport Statement claiming that there would be no queue of vehicles trying to exit the Site at peak periods. With a relatively small number of houses in the part of the north of the existing village generating traffic to exit School Lane onto the A48 in peak periods, my experience of reality not theory over many years clearly demonstrates that there would be significant delays for traffic exiting the Site to turn right, thus causing queues of following vehicles. By way of example, at 7.50 am on 3 November 2015, it took me over three minutes to exit from School Lane to turn right towards Cowbridge. There was a solid flow of slow east moving traffic and frequent groups of faster moving vehicles travelling west. I was only eventually able to exit when one of the vehicles travelling east gave way while there was a short gap in the traffic travelling west. As I drove west, the slow moving queue of vehicles travelling east along the A48 stretched back to Sycamore Cross and beyond.

- f. Paragraph 3.6 of the Transport Statement wrongly claims that there is no proposal in the public domain to trunk the A48 through St Nicholas. In answer to a written National Assembly Question (WAQ 65195) on 25 July 2013, the Minister for Economy, Science and Transport stated "Welsh Government is now developing proposals and a programme to improve the access and trunk a route from Culverhouse Cross to St Athan - Cardiff Airport Enterprise zone." Paragraph 2.2.61 of the Draft Infrastructure Plan of the Council dated September 2013 supporting the LDP referred to "the Welsh Government's proposals to trunk the route to Cardiff Airport via Culverhouse Cross - Sycamore Cross - Five Mile Lane - Airport."
- G. Pedestrian and cycle access to the Site. Please refer to item 12 of my letter dated 26 March 2015. The Estate Road (as defined at item 5 of my letter dated 26 March 2015) does not form part of the Revised Application. Nevertheless, the application relies on a pedestrian and cycle access from the Site to the centre of St Nicholas via Ger-y-Llan (for examples, see the first paragraph of section 3 and bullet point 4 of section 4 of the Access Statement and paragraphs 2.9 & 3.24 of the Transport Statement). The revised Site Plan dated 6 October 2015 shows a new pedestrian gateway (without description) from the Site into the Estate Road.

Ger-y-Llan can only be accessed from the Site via the Estate Road. The Estate Road is an unadopted private road, the main purpose of which is to provide access to the properties known as 11, 12 & 14 Ger-y-Llan ("the Three Properties"). For the last 26 years, it has also been used occasionally for access to part of the Site for agricultural purposes only. As stated at item 12 of my letter dated 26 March 2015, the owners of the Three Properties have an obligation to pay a fair and reasonable share of the costs of maintenance and repair of the Estate Road. In practice, throughout the last 26 years, the owners of the Three Properties have carried out (or arranged to be carried out at their expense) all maintenance and upkeep of the Estate Road.

The use of the Estate Road to provide pedestrian and cycle access from the Site to Ger-y-Llan (and to the centre of the village and school) by the residents of 96 new properties (or 116 new properties including the proposed Waterstone development) would have a considerable impact on the amenity of the residents of the Three Properties as well as the other residents of Ger-y-Llan. This would be contrary to the claim stated at bullet point 8 of section 4 of the Access Statement that the proposals would "minimise neighbour impact within the site and surrounding properties."

As the Revised Application does not include the Estate Road, the assumed use of the Estate Road to provide pedestrian and cycle access to the Site can only be described, both actually and metaphorically, as gaining such access without due process by 'the back door'. I wish to express my **strong objection to the proposed use of the Estate Road for pedestrian and cycle access to the Site.**

If, notwithstanding the many powerful objections to the Revised Application (and the Original Application), the Council fails to reject the Revised Application, **any approval should include a condition that all pedestrian and cycle access to the Site must be through the main access on the A48 and that the proposed new pedestrian gateway from the Site to the Estate Road should be removed and replaced by a wall, hedge or other suitable material to a height of six feet.**

H. Highways and traffic congestion. Please refer to item 13 and Appendices A & B of my letter dated 26 March 2015 and to my letter dated 25 August 2015. A number of additional issues arise from the Revised Application:

- a. Paragraphs 3.12, 4.2 & 4.12 of the Transport Statement seek to claim that traffic from the proposed Redrow development would have only a limited effect on the growth rates of traffic along the A48. Paragraph 4.4 states "There are no known local committed development schemes that require inclusion into this traffic effect assessment." This statement may or may not be legally correct. However, in real and practical terms, it is absurd.

The A48 through St Nicholas is already operating over capacity during peak periods (see item H(b) below). The Council is currently also considering the Waterstone Application and the Trehill Application. In addition to the proposed developments in St Nicholas, the LDP proposes large housing developments in Bonvilston, Cowbridge, Colwinston and Ystradowen, for some of which planning permissions have already been granted. A substantial proportion of the residents of these new developments will commute daily to Cardiff along the A48. The Welsh Government proposes to trunk the A48 (item F(f) above) and, if this proceeds, the objective is to increase the traffic flow along the A48. It is unsound and unsustainable to consider the effect of traffic generated by the proposed Redrow development in isolation. It is the aggregate effect on traffic flow of all proposed new developments which should be considered.

- b. In the last two years through e-mails; formal representations to the Council in connection with the LDP, the original Redrow application and the Waterstone Application; and in our telephone conversation on 25 August 2015, I have drawn attention to fundamental defects in the assessment by the Council of the extent of under-capacity or over-capacity of current usage of the A48 during peak periods. Specifically and in summary, firstly the capacity has been assessed at three points in the 60 mph sections of the A48 while sections in 40 mph and 30 mph and at traffic lights and junctions have been ignored. Secondly, no account has been taken of the Tesco Junction. Full details of my contentions have been set out at item 13 and in Appendices A & B of my letter dated 26 March 2015 and in my letter dated 25 August 2015 with the copy e-mails attached to that letter.

I draw your particular attention to those e-mails. The Council has repeatedly failed to provide any answer to my contentions other than to state that the assessment was "at a high level" and that "Not all junctions ... have been modelled." In the final e-mail on 3 July 2015, the Council made no attempt to justify the capacity assessment but merely 'kicked for touch' by stating "Following a review of the representations and issues raised, and indeed the examination hearing sessions, the Inspector [appointed to consider the LDP] may ask the Council for further supporting evidence in response to specific questions."

The issues which I have raised are fundamental to the sustainability of the A48 to cope with substantial increases in traffic at peak times arising from the proposed Redrow development and the other proposed developments and proposals to which I have referred at item H(a) above.

- c. Notwithstanding the fact that I have raised the issues described at item H(b) above, the Transport Statement fails to address them. Instead, it relies on unsubstantiated assertions in an e-mail to you from Mr Matt Thomas (Vectos (South) Limited) on 7 September 2015 (part of Appendix F of the Transport Statement) that "...there is plenty of spare highway capacity..." and that "Highway Capacity is not an issue for debate...". I strongly dispute these assertions which should not be accepted unless and until the Council and / or Redrow can provide a full and valid explanation to demonstrate that my contentions concerning the capacity of the A48 are incorrect and can also explain the long stationary or slow-moving queues on the A48 at peak morning periods (see example at item F(e) above).
- I. Open space. The Access Statement does not appear to state the amount of open space (including children's play areas) provided in the Site Plan dated 6 October 2015. However, a comparison of this plan with the original Site Plan dated 30 October 2014 appears to suggest that the area of open space has been substantially reduced.
- J. Sewage disposal. Paragraph 13.2 of the Planning Statement dated February 2015 stated "Foul drainage will discharge by gravity to the existing adopted system within the site." I have not found any other reference to the proposals for sewage disposal in the documents relating to the Original Application and the Revised Application on the Council's website. However, a letter received from Welsh Water (Nelson CF46 6LY) dated 30 March 2015 (reference 8000069544) stated that "...the receiving Waste Water Treatment Works is at capacity and at present would not be able to accommodate the foul flows deriving from the development site." The letter also stated the intention of Welsh Water to send a response to the Council [in respect of the Original Application] and that I would be able to view that response on the Council's website. I have been unable to trace that response on the Council's website and I would be grateful if you would advise me where it can be found. More importantly, it would appear that this critical issue has not been dealt with in either the Original Application or the Revised Application.
- K. Application is premature. Please refer to item 1 of my letter dated 26 March 2015. The Inspector has subsequently been appointed by the Welsh Government to consider the LDP. The Pre-Hearing Meeting will be held on 19 November 2015 and Hearing Sessions are scheduled to commence in January 2016. The inclusion of site number MG 2 - 43 in the LDP has been strongly challenged by many members of the public in written representations and will be further challenged at the appropriate Hearing Session. Also, the Highway Impact Assessment has been separately challenged in writing (see Appendix B to my letter dated 26 March 2015) and the Council's minimal response will be further challenged at the appropriate Hearing Session.

The conclusion of the Transport Statement (paragraph 5.7) relies on the inclusion of site MG 2 - 43 in the LDP and seeks to obtain planning permission in advance of the completion of the LDP process which is now at an advanced stage. It would be an outrageous abuse of the LDP process if, notwithstanding the powerful objections to the inclusion of site MG 2 - 43 in the LDP, planning permission were to be granted by the Council in advance of due consideration by the Inspector.

For the many reasons set out above and in my earlier letters dated 26 March and 25 August 2015, **I object to the Revised Application and request the Council to refuse planning permission** in response to both Original Application and the Revised Application.

Yours sincerely

A solid black rectangular box redacting the signature of Tim Knowles.

Tim Knowles

30 March 2016

Our Ref: CJD.LPC.3425

Mr S Rennie
Development Control
Vale of Glamorgan Council
Dock Office
Barry Docks
Barry
CF63 4RT

Dear Mr Rennie

Planning Application 2015/00249/FUL
Development of 101 houses and associated works
on land to the East of St Nicholas

Further to re-consultation in respect of further revised plans for the above proposal, I wish to make an additional strong Objection.

My previous correspondence of 1st April 2015 and 27th November 2015 sets out the substantive reasoning why this development is inappropriate and should be refused.

The alterations now proposed make no substantive changes to my well founded objections. Indeed the alterations now propose even more dwellings (a total of 101, which is 22 additional dwellings to those original proposed by this submission). This increase only exacerbates my objections.

You will be aware that as part of the Examination into the Vale of Glamorgan Local Development Plan a Hearing Session took place on Wednesday 9th March 2016 when the suitability of this 'potentially' allocated site was considered by the Inspector.

I attending the Hearing Session and made strong representations as to why the site should not be allocated. As will be verified by your Policy colleagues who attending the Hearing Session the Inspector made it abundantly clear that he has "serious concerns" about the potential allocation of the site.

These concerns were so strong that indeed he instructed the Council to produce a set of Action Points clarifying what his concerns were, and so that further information could be produced on each point to assist his judgment.

For your information enclosed are the Action Points that have been produced and it is most pertinent that these all reflect the concerns I put to the Inspector at the Hearing, particularly the following three bullet points under Item 1.

LPC (Trull) Ltd
Trull Tetbury
Gloucestershire
GL8 8SQ



- *Justify the scale of growth relative to the existing built form, including an explanation as to how the development would impact upon the character of the area;*
- *Explain how the scale of growth can be delivered in accordance with the legislative requirement to preserve or enhance the character or appearance of the respective Conservation Areas/ listed buildings; and*
- *Justify the scale of development relative to the availability of facilities and services, with particular reference to whether the development would be compliant with the Plan's own objectives (particularly Objectives 2 and 3) and the sustainability principles that underpin PPW. Further to the discussions at the hearing, the Council should explain how the functional relationship between clusters of settlements is considered to enhance the sustainability of the identified settlements.*

The Inspector has not set a Timetable yet for the response to the Actions Points.

Given the close interaction between the principle of residential development on this site and the emerging Local Development Plan process (and the fact that the Local Plan Inspector has stated his serious concerns about the potential allocation of this site), it will be grossly unreasonable for the application to be determined prior to the adoption of the Local Development Plan, unless the determination is for refusal.

I trust you will take these views into account in your determination of the application and I would be grateful if you could keep me informed of the progress of the application in due course.

Yours sincerely



Chris Dance
Associate

cc Client

Rennie, Steven

From: Paul Williams [REDACTED]
Sent: 25 September 2016 13:10
To: Rennie, Steven
Subject: Further Objection to Planning Application for Land to the East of St Nicholas: 2015/00249/FUL/SR2
Attachments: 2016 03 28 - Paul Williams letter of objection.docx; 2016 04 16 - Paul Williams letter of objection.docx; 2016 09 25 - Paul Williams letter of objection.docx

Dear Mr Rennie

Planning Application by Redrow Homes: Land to the East of St Nicholas: LDP Site MG2 [43]
12 September 2016: Amended proposal to build 100 houses Your ref: 2015/00249/FUL/SR2
<http://vogonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2015/00249/FUL>

I refer to my previous letters regarding the above planning application (2 of the recent ones attached).
I wish to reiterate all of the objections that I have made to this proposed development in the past.

I am writing with 2 further objections, to be added to those made previously by me:

- 1 The proposals do not include any plan to respect the privacy of my garden. The document **1537-01J Planning Layout St Nicholas.pdf** does not show any proposal to place a fence or wall in-between my garden and the new proposed development. The existing hedgerow between myself and the field appears to be the sole barrier between myself and the new housing. The existing hedgerow is made of deciduous plants. From November to June the absence of leaves in this hedge thus means that it is possible to see straight through it. This does not matter when the area to the North and East of the garden is open countryside. If this should be built upon then occupants of houses surrounding the garden on these sides would have an open view into my garden through the hedge. It is thus necessary for the developers to include in their plans a new fence or wall to be built to surround the existing hedge in order to preserve the privacy hitherto existing.
- 2 The road leading west from the land to Ger-y-lan (the road past Nos 11, 12 and 14 Ger-y-lan) is an unadopted road and not a public right of way. The amended site plan of 3 March 2016 showed a new pedestrian gateway from the land into this road. There is furthermore a proposal in Section 3 of the *Revised design and access statement* for provision of pedestrian and cycle access to Ger-y-lan via this unadopted road. The current plans show drop-down bollards as replacements for the existing gate leading into the field. The owners of the field only have limited rights of access to the field via this unadopted road. There is no automatic access to this road from the residents of this massive proposed development. The proposed use of this unadopted road for access to Ger-y-lan by those living in 117 houses would certainly not cause **minimal neighbour impact within the site and surrounding properties** as is claimed in Section 4. It would cause a major disturbance to the amenity of the occupiers of the above 3 properties and to all the other residents of Ger-y-lan. I would suggest that erection of a wall at the site of the existing gate would be the minimum requirement to enable there to be caused '**minimal neighbour impact within the site and surrounding properties**'. I thus object to the proposal to permit this pedestrian and cycle access to Ger-y-lan via this route.

As previously stated this planning application conflicts with many Vale of Glamorgan planning policies, has multiple basic flaws, is out of order and in breach of stated planning policies.

I would be most grateful if you would acknowledge receipt of this further letter of objection.

Yours sincerely

COPY BY E-MAIL - [REDACTED]

Your ref.: 2015/00249/FUL/SR2

3 October 2016

Ms V L Robinson
Operational Manager - Development Management
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

Dear Ms Robinson

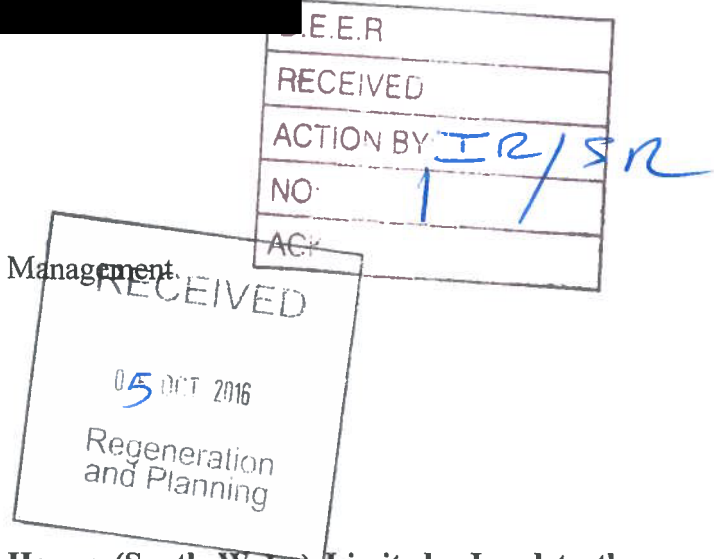
Planning Application by Redrow Homes (South Wales) Limited - Land to the East of St Nicholas ("the Application")

I refer to your letter dated 12 September 2016 and the Report on the above proposed development submitted to the Planning Committee ("the Committee") for consideration at the meeting of the Committee to be held on 6 October 2016 ("the Report").

The letter dated 12 September 2016 gave 21 days for representations, thus allowing such representations to be made up to 3 October 2016. The issue of the Report in advance of that date implies that any representations, however pertinent, would be ignored in making recommendations to the Committee.

The Report presents the case in support of the recommendation of the Planning Department ("the Department") for approval of the Application. It is a one-sided Report which makes no realistic attempt to describe the numerous strong objections, many with detailed arguments, submitted by local residents objecting to the Application. It is noteworthy that there were over 190 objections (page 36), most from residents of the 141 existing properties in the village. This demonstrates the strength of the local opposition to the Application.

I have submitted seven letters at various stages in the consideration of the Application by the Department as new and changed proposals emerged. Each letter set out detailed arguments against the Application but most of these issues have been ignored or brushed aside in the Report. No attempt has been made to justify the apparent view of the Department that the issues described were incorrect or irrelevant. The failure to deal properly in the Report with the objections made by me and many other local residents clearly demonstrates that the Department had determined by the time of issue of the Deposit Local Development Plan ("the LDP") in November 2013 that 100 houses would be built in St Nicholas and from that point onwards the Department had no intention of being confused by the facts.



Out of over 190 objections received by the Department, only three letters have been reproduced in Appendix C of the Report. These letters do not demonstrate to the Committee the extent and nature of the many powerful objections to the Application. The first and third letters clearly indicated that they were supplementary to earlier more detailed objections which have not been reproduced in the Report. The second letter merely summarises a few issues from an enclosed detailed report by a planning consultant which has not been reproduced.

The following is a brief summary of some of the issues raised by me in my seven letters and not dealt with adequately in the Report:

1. Prematurity. The consideration of the LDP by the Inspector appointed by the Welsh Government is at an advanced stage. The Inspector is expected to report in early 2017 (page 44). The proposed development at St Nicholas featured prominently in the Public Hearing Sessions in early 2016. Many detailed objections were raised to the inclusion of the St Nicholas development in the LDP and some of the contents and conclusions of the supporting documents issued by the Council were challenged in written representations and at the Public Hearings. As a result, the Inspector issued a number of Action Points specifically related to St Nicholas. The Council has responded to these Action Points but the six weeks Consultation Period on Matters Arising Changes did not commence until 26 September 2016. There are strong grounds for believing that the Inspector will not approve the inclusion in the Adopted LDP of a development of 117 houses at St Nicholas. Consequently, consideration of the Application by the Committee should not be based on a presumption that the proposed development at St Nicholas will be included in the Adopted LDP. Any approval of the Application at this late stage in the LDP process in the light of the many powerful objections is premature, undemocratic and makes the LDP process a very expensive and time consuming farce.
2. Disproportionate. The proposed development of 117 houses (including 17 by Waterstone Homes Limited) in a village of 141 houses (most of which are in a Conservation Area) represents an increase of 83%. When the LDP allocated 100 houses to St Nicholas, the Welsh Government in its representation on the LDP stated "Allocations in some minor rural settlements, for example 100 units in St Nicholas and 120 units at Bonvilston, appear disproportionate to current services and facilities." While apparently ignoring this representation, the Department has subsequently increased the allocation at St Nicholas to 117 houses. The proposed development is wholly disproportionate to the size of the existing village.
3. Out of character with the existing minor rural settlement. St Nicholas has grown organically over many centuries. The village is spread out with most houses in substantial plots on both sides of the A48 which runs through the centre of the village. Residents have chosen to live in a rural environment away from urban development. The Report (page 49) claims that the overall density of St Nicholas is approximately 10 dwellings per hectare. This figure is disputed. Evidence with a supporting map was submitted to the Department on 10 December 2013 in a representation on the LDP demonstrating that the density is approximately 4.4 houses per hectare. The density of Ger-y-Llan is approximately 9.3 houses per hectare.

The Report cites higher densities in Church Row and Smiths Row as justification for a density of over 25 houses per hectare in the proposed development. Church Row comprises 4 dwellings and Smiths Row comprises 5 dwellings. These small groups of houses cannot be compared with or used to justify a relatively huge development of 100 houses (or 117 houses including the proposed Waterstone development). Furthermore, Smiths Row comprises mainly old thatched cottages, very different in character from the proposed development. A development on the scale proposed would irreversibly destroy the nature and character of the ancient rural village.

4. Services and facilities. St Nicholas has no shop, public house, restaurant, post office, doctor's surgery, leisure centre or library. There are only minimal employment opportunities in the village. Thus, the residents of the proposed development would be obliged to make short car journeys or expensive bus trips for almost all of their daily needs. The nearest shops are at Culverhouse Cross which is 1.6 miles from the entrance to the site and significantly further from the northern part. It is unrealistic to expect residents to walk or cycle to the shops and other facilities with the return journey up the long steep hill known as The Tumble. The need for short car trips conflicts with Objective 3 and paragraph 7.12 of the LDP.
5. Affordable housing. The need for affordable housing in the Vale of Glamorgan is not disputed. However, statistics produced by the Council have demonstrated that there is either no net need or, at most, minimal need in St Nicholas. The main areas of need for affordable housing are in the primary settlements of Barry, Llantwit Major and Penarth. The Application provides for 35 affordable or intermediate dwellings. Most if not all of these dwellings would inevitably be allocated to persons or families currently living outside St Nicholas and having no family connection with existing residents of St Nicholas. The new residents would be isolated from their current communities and families. They would need to make frequent car or bus journeys to maintain their links with those communities and families. There is no direct bus service to the primary settlements so bus journeys would be long and difficult.

The Department has sought to justify the allocation of affordable houses to St Nicholas by reference to an alleged demand in Wenvoe and Peterston-super-Ely. Wenvoe is in the same political Ward as St Nicholas but has no connection with St Nicholas, is over three miles away by road and has adequate provision for affordable houses in developments currently under construction at the ITV site and to the immediate south of Wenvoe. Peterston-super-Ely is over three miles away by road, most of which is through narrow country lanes which already have more traffic than can be reasonably accommodated. To the extent that there is any demand for affordable houses in Peterston-super-Ely, it would be more than adequately provided by the proposed development at Bonvilston which is closer by road.

6. Village road capacity. The centre of the village (north of the A48) is often heavily congested with parked vehicles, particularly in the roads around the church immediately before the weekday opening and closure of the school. Similar congestion occurs when there is a wedding or funeral at the church. The roads on the north side of St Nicholas are wholly unsuitable for any of the additional traffic which would be generated by the proposed development. There is no pavement on the roads around the church. It is particularly unsuitable and dangerous for young children and any disabled person on School Lane to the north and east of the church. There is no room for a wheelchair on the road to the north where vehicles are usually parked leaving barely enough room for other vehicles to squeeze through.

Any vehicle travelling in either direction along School Lane has to negotiate a blind bend at the junction with Well Lane in the north east corner of School Lane. This is particularly dangerous when vehicles are parked on the bend as is frequently the case. The exit from Ger-y-Llan is also blind and dangerous as vehicles travelling south on School Lane pick up speed.

7. Main access to site. The proposal to have two new access roads from the A48 within about 72 metres of each other is, to say the least, ludicrous. A single access would cause significant problems and dangers but two access roads would exacerbate those problems and dangers. While the proposal provides for a filter lane for traffic from Culverhouse Cross turning right into the site, the main problem and dangers arise from traffic leaving the site to turn right towards Cowbridge. Long experience of turning right out of School Lane onto the A48 demonstrates that it is very difficult at peak morning and afternoon periods to find gaps in traffic travelling in both directions along the A48. It is frequently necessary to wait for a motorist to give way in order to exit School Lane.

Traffic turning right when exiting the site will have to cross two lanes of traffic, the eastbound lane and the filter lane before joining through westbound traffic on the A48. The proposed access road is almost opposite the Old Police Station which is now used for business purposes and generates additional traffic movements.

The proposal also envisages the removal of an existing lay-by on the eastbound side of the A48. This lay-by is frequently used by service vehicles and visitors to nearby properties. Its removal will necessitate parking on the busy A48, causing additional hazards and dangers for traffic.

8. Pedestrian and cycle access. The status of the private drive which connects the site to Ger-y-Llan is described on page 54 of the Report. Although the private drive is outside the site which is the subject of the Application, the Application includes a gateway or bollards (the plan is unclear) at the entry to the site from the private drive and envisages the use of the private drive for pedestrian and cycle access to the site. Such use of the private drive by residents (including children) of 100 houses (117 including the proposed Waterstone development) will cause immense disturbance to the amenity of the occupiers of the three properties along the private drive as well as other residents of Ger-y-Llan.

9. Highways and traffic congestion. The Report describes highway issues related to site access and internal lay-out (pages 60 to 62). It does not appear to address the critical issue of congestion on the A48 and at Culverhouse Cross, particularly during the peak morning period when there are long tail-backs of stationary or slow-moving vehicles often stretching to the west of Bonvilston. The A48 and the Culverhouse Cross roundabout are already operating over capacity.

In formulating the LDP and determining the site allocation at St Nicholas, the Council very seriously misinformed itself concerning the capacity of the A48. This capacity was calculated at three points between Cowbridge and Culverhouse Cross, all of which are in the national 60 mph speed limit. No account was taken of the 40 mph speed limit from west Bonvilston to west St Nicholas; the 30 mph speed limit through St Nicholas; and the inevitable delays at the traffic lights at Sycamore Cross and Duffryn Lane as well as at other uncontrolled junctions.

The Transport Statements submitted in support of the Application refer only to the extra vehicle movements resulting from the proposed development. Even taken in isolation, these additional vehicles will cause greater congestion. When taken together with other started and proposed developments at Cowbridge, Colwinston, Ystradowen, Bonvilston and the Waterstone site along with traffic increases arising from other projects such as the widening of Five Mile Lane, the congestion on the A48 and at Culverhouse Cross will become unsustainable. The congestion at Culverhouse Cross will be further exacerbated by the current housing construction at ITV and Wenvoe. The Council and, as appropriate, Cardiff City Council and the Welsh Government have no plans to alleviate this unsustainable congestion.

10. Open space. The original proposal by the Applicant was for 79 houses and provided significant areas of open space which, together with the Waterstone application, amounted in total to 0.48 hectares. In the latest proposal now presented for approval by the Committee, most of the open space has been removed in order to cram 100 houses into a densely crowded site. Only a small LEAP area and a tiny LAP area have been provided. The exact size of the LEAP area is not clear from the latest site plan but it appears to be no larger than a garden in some of the existing properties adjacent to the site. It is certainly not large enough for the many children who would reside in the 100 houses to play football or other ball games. There appears to be no explanation in the Report on where the children will find necessary open space for ball games. The availability of the field at St Nicholas School does not appear to have been established and, even if it were available, it would involve the children having to walk or cycle through the narrow and dangerous roads in the centre of the village (item 6 above) to reach the field.

11. Education facilities. The arrangements for education facilities are described on pages 68 & 69 of the Report. The projected demands for 9 nursery, 25 primary and 23 secondary places appear to be substantial under-estimates for a development of 100 houses. There is no nursery in St Nicholas. The Report confirms that there are no available places for primary pupils at St Nicholas School. The Report appears to suggest that most nursery and primary pupils would travel to Peterston-super-Ely or Pendoylan Schools. Both villages are over three miles away by road, most of which is through narrow country lanes which already have more traffic than can be reasonably accommodated. Two double journeys by car would be required each school day for those parents with cars. There is no direct bus service for parents without a car.
12. Principle of development. The conclusion on the principle of development at St Nicholas (pages 47 & 48) relies heavily on background papers produced by the Council in support of the LDP, including the Sustainable Settlements Appraisal, the Stage 2 Detailed Site Assessment and the Stage 3 Sustainability Appraisal. Some of the key assumptions, statistics and conclusions contained in these reports so far as they related to St Nicholas have been strongly challenged in written representations and in the Public Hearings in the LDP process. Until a conclusion has been reached by the Inspector on these issues, no reliance should be placed on the contents of these background papers to the extent that they have been challenged.
13. Inconsistency. Attention is drawn to the attached extract dated 9 January 2016 from the Minutes of the meeting of the Committee held on 17 December 2015 concerning planning application number 2015/00689/OUT by Trehill Homes Limited ("the Trehill Application") relating to land south of the A48 at St Nicholas. The Minute sets out six reasons why the Trehill Application would have been refused. I submit that each of those reasons applies with equal force to the Application. As the Committee has confirmed that the Trehill Application would have been refused, these reasons alone should be sufficient to refuse the Application. The recommendation of the Department for approval of the Application is inconsistent with its recommendation (endorsed by the Committee) on the Trehill Application.

Before any consideration of determination in favour of the Application, I urge the Committee to arrange a site visit. The Committee should consider how the proposed development on green fields would irreversibly destroy the character of this ancient village. The members should also view the narrow roads around the church, if possible around 3.30 pm on a normal school day, and the proposed two access points onto the A48.

The Department argues in the Report that various identified individual issues do not provide adequate grounds for refusal of the Application. However, I have summarised above some of the many strong objections to the Application. Taken together, I submit that they constitute very powerful grounds for refusal of the Application and I request that the Application be refused.

Please circulate copies of this letter as a late representation to all members of the Committee in advance of the meeting on 6 October 2016.

Yours sincerely

A solid black rectangular box redacting the signature of Tim Knowles.

Tim Knowles

9 January 2016

Vale of Glamorgan Council

Minutes - Planning Committee - 17 December 2015
Extract

2015/00689/OUT Received on 18 June 2015

(p82)

Trehill Homes Limited, C/o Agent

Asbri Planning Limited, Unit 9, Oak Tree Court,, Cardiff Gate Business Park,,
Cardiff., CF23 8RS

Land south of A48 and west of Old Rectory Drive, St. Nicholas

Outline application for residential development and associated works

RESOLVED -

(1) T H A T Members of the Planning Committee noted the conclusions within the report and agreed that these form the basis of the Council's case in the current non-determination appeal and that the application would have been refused for the reasons set out below:

1. The proposed residential development is outside the defined settlement boundary of St. Nicholas and there is no overriding justification or material consideration to outweigh the in principle policy presumption against such development. As such the development would be contrary to Policies ENV1 - Development in the Open Countryside and HOUS2 - Additional Residential Development of the adopted Vale of Glamorgan Development Plan 1996, as well as Planning Policy Wales (Edition 7) July 2014.
2. The residential development would have an unacceptable visual impact on the character and amenity of this undeveloped rural landscape and would be harmful to the special qualities of the Duffryn Basin and Ridge Slopes Special Landscape Area in this location. As such the development of this sensitive rural area and landscape would be contrary to Policies ENV4 Special Landscape Areas, ENV27 - Design of New Developments and ENV10 Protection of the Countryside of the adopted Vale of Glamorgan Development Plan 1996 - 2011, as well as Planning Policy Wales (Edition 7) July 2014.
3. The residential development would result in the loss of an area of open countryside that plays an important role in providing a strong rural character and setting to the St Nicholas Conservation Area in this location, over which there are currently significant views from the Conservation Area towards the Severn Estuary. Accordingly, the development is considered to neither preserve nor enhance the setting of the Conservation Area, in conflict with the Council's Adopted Conservation Area Appraisal and Management Plan, policies ENV17 - Protection of the Built and Historic Environment and ENV20 - Development in Conservation Areas of the adopted Vale of Glamorgan Development Plan 1996 - 2011, as well as Planning Policy Wales (Edition 7) July 2014 and W/O Circular 61/96. The development will also conflict with the duty imposed by Section 72(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.

4. The development would overload the public waste water treatment works for which no improvements are planned at present and the developer has failed to provide any information that indicates that the development will not adversely affect or overload the public sewerage system and as a consequence the development is contrary to Policies ENV27 Design of new developments and ENV29 Protection of Environmental Quality of the Vale of Glamorgan Adopted Unitary development Plan 1996-2011.

5. In the event that the evidence establishes that the grade of the agricultural land is grade 2 or 3a, the development would result in the unnecessary loss of the best and most versatile agricultural land, contrary to policy ENV2 – Agricultural Land of the Vale of Glamorgan Adopted Unitary development Plan 1996-2011, Planning Policy Wales (Edition 7) July 2014 and Technical Advice Note 6 on Planning for Sustainable Rural Communities.

6. The proposed housing development would generate the need for additional school places which cannot be met by existing spare capacity and the development cannot make appropriate provision for education facilities to serve the development through Planning Obligations, without undermining the Council's ability to deliver strategically important development sites within the area. Accordingly, the application is contrary to criterion (vi) of Policy HOUS8 of the Vale of Glamorgan Adopted Unitary development Plan 1996-2011, the Council's approved Planning Obligations SPG and the advice in paragraph 12.1.1 of Planning Policy Wales (7th Edition) July 2014.

(2) T H A T, in the event that the appeal decision for the residential development site on land to the south west of Weycock Cross is received prior to the consideration of the appeal subject of this report, Members agreed that the Council's evidence when prepared takes account of that appeal decision and that officers be given delegated authority to amend the Council's stance in respect of the above listed reputed reasons for refusal.

Reason for decision

(2) To ensure the Council's officers take account of all material considerations relevant to the appeal at the time of preparing and giving evidence, that are relevant to the appeal.

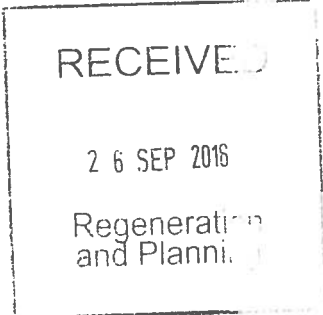
Payne, Adrienne J

From: Rennie, Steven
Sent: 26 September 2016 10:05
To: Planning
Subject: FW: Further Objection to Planning Application for Land to the East of St Nicholas: 2015/00249/FUL/SR2
Attachments: 2016 03 28 - Paul Williams letter of objection.docx; 2016 04 16 - Paul Williams letter of objection.docx; 2016 09 25 - Paul Williams letter of objection.docx

Objection letters to be registered, printed and stamped.

Thanks

Steven Rennie
Senior Planner / Uwch Gynllunydd
Regeneration and Planning / Adfywio a Chynllunio
Vale of Glamorgan Council / Cyngor Bro Morgannwg
tel / ffôn: [REDACTED]
mob / sym: [REDACTED]
e-mail / e-bost: [REDACTED]



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Ewch i'n gwefan yn www.bromorgannwg.gov.uk

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D.E. R.
RECEIVED
ACTION BY: SDB
NO: 27
ACK

Correspondence is welcomed in Welsh or English / Croesewir Gohebiaeth yn y Gymraeg neu yn Saesneg.

From: Paul Williams [REDACTED]
Sent: 25 September 2016 13:10
To: Rennie, Steven
Subject: Further Objection to Planning Application for Land to the East of St Nicholas: 2015/00249/FUL/SR2

Dear Mr Rennie

Planning Application by Redrow Homes: Land to the East of St Nicholas: LDP Site MG2 [43]
12 September 2016: Amended proposal to build 100 houses Your ref: 2015/00249/FUL/SR2
<http://vogonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2015/00249/FUL>

I refer to my previous letters regarding the above planning application (2 of the recent ones attached).
I wish to reiterate all of the objections that I have made to this proposed development in the past.

I am writing with 2 further objections, to be added to those made previously by me:

- 1 The proposals do not include any plan to respect the privacy of my garden. The document **1537-01J Planning Layout St Nicholas.pdf** does not show any proposal to place a fence or wall in-between my garden and the new proposed development. The existing hedgerow between myself and the field appears to be the sole barrier between myself and the new housing. The existing hedgerow is made of deciduous plants. From November to June the absence of leaves in this hedge thus means that it is possible to see straight through it. This does not matter when the area to the North and East of the garden is open countryside. If this should be built upon then occupants of houses surrounding the garden on these sides would have an open view into my garden through the hedge. It is thus necessary for the developers to include in their plans a

new fence or wall to be built to surround the existing hedge in order to preserve the privacy hitherto existing.

- 2 The road leading west from the land to Ger-y-Ilan (the road past Nos 11, 12 and 14 Ger-y-Ilan) is an unadopted road and not a public right of way. The amended site plan of 3 March 2016 showed a new pedestrian gateway from the land into this road. There is furthermore a proposal in Section 3 of the *Revised design and access statement* for provision of pedestrian and cycle access to Ger-y-Ilan via this unadopted road. The current plans show drop-down bollards as replacements for the existing gate leading into the field. The owners of the field only have limited rights of access to the field via this unadopted road. There is no automatic access to this road from the residents of this massive proposed development. The proposed use of this unadopted road for access to Ger-y-Ilan by those living in 117 houses would certainly not cause **minimal neighbour impact within the site and surrounding properties** as is claimed in Section 4. It would cause a major disturbance to the amenity of the occupiers of the above 3 properties and to all the other residents of Ger-y-Ilan. I would suggest that erection of a wall at the site of the existing gate would be the minimum requirement to enable there to be caused '**minimal neighbour impact within the site and surrounding properties**'. I thus object to the proposal to permit this pedestrian and cycle access to Ger-y-Ilan via this route.

As previously stated this planning application conflicts with many Vale of Glamorgan planning policies, has multiple basic flaws, is out of order and in breach of stated planning policies.

I would be most grateful if you would acknowledge receipt of this further letter of objection.

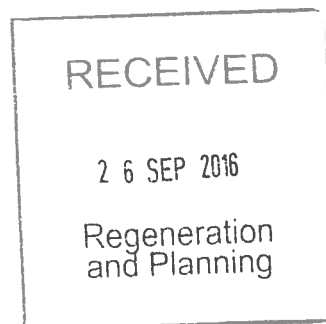
Yours sincerely

Dr Paul Williams

11 Ger-y-llan
St Nicholas
Vale of Glamorgan
CF5 6SY

28 March 2016

Mr Steven Rennie
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry CF63 4RT



Dear Mr Rennie

**Planning Application by Redrow Homes: Land to the East of St Nicholas: LDP Site MG2 [43]
11 March 2016: Amended proposal to build 101 houses Your ref: 2015/00249/FUL/SR2**

I wish to object to the above planning application for development of 101 houses on land to the east of St Nicholas for many reasons which I give below:

- 1 This application is out of order** The Deposit Local Development Plan (LDP) is currently being processed by the Vale of Glamorgan Council (VOGC). I have previously registered my objections to this, as have numerous other residents of St Nicholas, on the basis of a large number of errors and wrong conclusions made by the authors of the LDP. These objections and the consideration that should be given to them are currently subject to the required due process. The land to the east of St Nicholas that is the subject of this planning application forms part of the allocated site number MG2-43 which should be deleted from the LDP on numerous grounds as set forth in my objections to the LDP. For the planning officers of the VOGC to give permission for this planning application to go ahead would make a mockery of the planning process in that the constitutional objections would be ignored before the Inspector has issued his verdict on the LDP. This application is totally out of order by virtue of being lodged during a period when consideration of the LDP is still ongoing. To grant permission for this application to go ahead would constitute an abuse of the planning procedure that would indicate to any party with a vested interest in future how to overthrow the judgement and undermine the professionalism of planning officers, by subverting the very planning process itself. The VOGC has already confirmed that it currently has no shortfall in the 5-year supply of land for housing, such that there is no justification to consider this application at this time, before the formal adoption of the LDP after the Inspector's report. **The application is premature and should not be considered as the site forms part of MG2-43 which should be deleted from the LDP, as suggested by many persons, whose objections are constitutionally under consideration at present. This should disallow this application from being considered further, as allowing it to proceed would willfully consign constitutional objections to dismissal by planning officers or the VOGC, rather than by the Inspector.**

- 2 **The proposals in this application are contrary to or in breach of the policies in the most recent Unitary Development Plan (UDP). With reference to the current documents referred to by the LDP:**
- A. The document **01 - Deposit plan written statement November 2013** states on pages 25 & 26 under 'Vision and Objectives' that objective 4 is to protect and enhance the Vale of Glamorgan's historic, built, and natural environment. Objective 10 is 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. **This planning application is not consistent with either of these objectives. The proposed site is currently prime agricultural land in open countryside. This is graded as grade 2 land, not grade 3A as Redrow claim it to be. It is not an in-fill area of land. The village of St Nicholas would be completely distorted by such a massive development. This would represent a major incursion of building into open countryside. This planning application would have a major detrimental impact on the existing character and local environment of the minor rural settlement of St Nicholas, which has grown organically over many centuries. This planning application completely contravenes objective 4. Such objections to development on this scale have already been pointed out to the VOGC by the Welsh government in its response to the initial LDP.**
- B. The document **01 - Deposit plan written statement November 2013** states on pages 55 – 59 under 'Policy MG1 – Housing supply in the Vale of Glamorgan that there is a housing land requirement of 9,950 new dwellings during the plan period. It goes on to say, *inter alia*, that this will be met through the use of small sites including infill and with priority given to brown field and committed sites. **The land to the East of St Nicholas is neither in-fill nor brown field site and so these proposals do not comply with policy MG1.**
- C. The document **01 - Deposit plan written statement November 2013** states on page 94 under 'Policy MD1 – Location of new development that 'development will be favoured where it has no unacceptable impact on the countryside. The planning application by Redrow has a major impact on the countryside. **The proposals to develop the land to the East of St Nicholas directly contravenes policy MD1.**
- D. The document **01 - Deposit plan written statement November 2013** states on pages 95–97 under 'Policy MD2 – Place making that proposals should ' Respond appropriately to the local context and character of neighborhood buildings in terms of type, form, scale, mix and density. This planning application is for 101 houses on 3.65 hectares of land, a density of 27.7 houses per hectare. This grossly exceeds the adjacent Conservation Area which has a density of less than 6 houses per hectare. **This is an urban degree of density that is completely out of context with the existing village and Conservation Area – one that would permanently ruin its character and amenity. This planning application directly contravenes policy MD2 (paragraphs 7.5 of the LDP and 4.5 of the Deposit LDP).** It is wrongly claimed at paragraph 2 of the Planning Statement that there is no planning history for the Site. Two planning applications for house construction on part of the Site were refused by VOGC on 10 January 1989 for the construction of 10 houses and on 22 May 1991 for the construction of 6 houses (ref 1988/01152/OUT). **The grounds for refusing permission for the construction of 6 or 10 houses apply even more to the proposed construction of 101 houses.**

In its representations to VOGC on the LDP, the Welsh Assembly Government stated that 'Allocations in some minor rural settlements, for example, 100 units at St Nicholas

and 120 units at Bonvilston appear disproportionate to current services and facilities.’ (paragraph B.1(d) of the Annex to the letter of 20 December 2013, VOGC reference P/POL/AMW/LDP3). The scale of developed in this application is wholly disproportionate to the size of the current village.

- E. The document 01 - Deposit plan written statement November 2013 states on page 102 under ‘Policy MD6 – Development within minor rural settlements that new developments in minor rural settlements will be permitted where ‘the proposal would not represent a visual intrusion into countryside or the loss of important open spaces that contribute to local amenity, character or distinctiveness’. **This planning application constitutes a de facto visual intrusion into countryside, and the distinct character and amenity of the rural view of St Nicholas after emerging from the urban environments of Cardiff and Culverhouse Cross. Proposals to develop the land to the East of St Nicholas thus directly contravene policy MD6.**
- F. The document 01 - Deposit plan written statement November 2013 states on page 106 under ‘Policy MD9 – Historic Environment that development proposals must protect the qualities of the built and historic environment of the Vale of Glamorgan, specifically within Conservation Areas, development proposals must preserve or enhance the character or appearance of the area. **The area of land to the East of St Nicholas borders the Conservation envelope of the village, and was not included in the UDP as land for development. This planning application is the contrary to the UDP. It neither preserves nor enhances the character or the appearance of the area, and so directly contravenes policy MD9.**
- G. The document 10 – LDP Affordable Housing Background paper shows on Table 2, page 5 the distribution of Affordable Housing Requirement in the Vale:

a. Sub Area	Need Requirement					
	1. Need	Supply	Total	% of net shortfall	Supply (% of need)	
b. Barry	1,018	466	552	59.9%	45.8%	
c. Penarth	236	109	153	16.6%	41.6%	
d. Rural	45	10	35	3.8%	22.3%	
e. East Vale	-3	4	-7	0	-	
f. Coastal 236	54	182	19.7%	22.9%		
g. Total	1,558	643	915	100%	41.3%	

The (emboldened row in the) Table shows (and paragraph 3.7 above it in document 10 states) that there is no shortage of affordable housing identified in the Eastern Vale. **Proposals to develop the land to the East of St Nicholas thus cannot be justified by a putative need for affordable housing, for no such housing is required in the Eastern Vale. The lack of local services such as a shop, post office, public house, doctor’s surgery etc and infrequent bus services make the construction of affordable housing at this site even more illogical.**

- H. The document 11 – LDP Affordable Housing Viability Study shows on Table 3.3 and 3.4 on page 21-22 the cost of residential and industrial land values regionally.

Table 3.3 Residential land values regionally

WALES			
REGION	Small Sites (sites for less than five houses)	Bulk Land (sites in excess of two hectares)	Sites for flats or maisonettes
	£s per hectare	£s per hectare	£s per hectare
Cardiff	2,750,000	2,750,000	2,600,000
Carmarthen	900,000	900,000	850,000
Merthyr Tydfil	1,100,000	1,000,000	1,000,000
Bridgend	1,550,000	1,550,000	1,550,000
Swansea	1,400,000	1,400,000	1,800,000
Llandudno	1,000,000	850,000	1,000,000
Newport	1,900,000	1,900,000	1,400,000
Wrexham	1,000,000	850,000	1,000,000

Table 3.4 Industrial land values in Wales

WALES			
	From £s per ha	To £s per ha	Typical £s per ha
Cardiff	210,000	315,000	270,000
Carmarthen	160,000	210,000	190,000
Merthyr Tydfil	135,000	200,000	160,000
Taff Ely	125,000	205,000	140,000
Swansea	190,000	245,000	235,000
Colwyn Bay/Llandudno	200,000	300,000	250,000
Newport	180,000	250,000	225,000
Deeside	200,000	300,000	250,000

They show that the cost of Industrial land is about 1/6th to 1/10th that of residential land. The cost of the plot of land upon which a house is built is for most houses the major part of the cost. Thus houses will be much cheaper if built on industrial land. This proportional better value (more sq ft of living space per £ spent) will apply particularly to affordable housing. Thus the economics argues strongly in favour of not developing prime-land sites such as the land to the East of St Nicholas, but developing sites in the Vale such as Llandow Trading estate. Any housing need in the Vale of Glamorgan could be provided on brownfield land such as Llandow or land of lower agricultural grade. The proposed site allocation on grade 2 (or 3A) agricultural land **conflicts with paragraph 4.10.1 of July 2014 'Planning policy for Wales'**.

- I. The document **20 – LDP findings of the Site Assessment Background paper** shows on Table 5 (page 47), which shows the sustainability scores for allocated sites, that the site for which planning permission is sought scores a ' - ' on 'To use land effectively and efficiently', 'To protect and enhance the built environment and natural environment' and 'To reduce the need to travel and enable the use of more sustainable modes of transport'. **Proposals to develop the land to the East of St Nicholas by the VOGC's own assessment thus represents failure in these major conservation and green objectives.**
- J. The document **21 – LDP Green Wedge Background paper** states on page 9 that each of the existing green wedges and any proposals for new green wedges are assessed against the following objectives:
 - a. To prevent urban coalescence between and within settlements;
 - b. To ensure that development does not prejudice the open nature of the land;
 - c. To protect undeveloped land from speculative development and
 - d. To maintain the setting of built up areas

The land for which planning permission is sought should become part of the green wedge to prevent the coalescence of Culverhouse/Cardiff and the Eastern Vale by extending the existing green wedge that lies north of Wenvoe westwards. We should be increasingly protecting and extending such green wedge areas rather than developing those agricultural areas that adjoin existing green wedges. **Proposals to develop the land to the East of St Nicholas make such coalescence between Culverhouse Cross and the Eastern Vale at some stage in the future more likely.**

- K. The document **31 – LDP Population & Housing Projections Background** paper shows in Table 1 (page 10) the main components of population change used in the Welsh Government **2006-2030** based predictions for the Vale of Glamorgan. The no of births per year exceed the no of deaths by between 2 and 250 per year. However there is net migration of population into the Vale of Glamorgan of **815** per year. **It is this projected inward migration of 815 per year that creates the bulk of the projected housing demand.**

Table 10 (page 23) shows the main components of population change used in the Welsh Government **2008-2032** based predictions for the Vale of Glamorgan. The no of births per year exceed the no of deaths by between 44 and 350 per year. However there is net migration of population in to the Vale of Glamorgan is now significantly lower than the 2006 estimate, at **547** per year. **Thus in the 2 years from 2006 to 2008, the projected inward migration has been reassessed and reduced from 815 to 547 per year.**

Table 29 (page 42) shows the main components of population change used in the Welsh Government **2011-2036** based predictions for the Vale of Glamorgan. The no of births per year exceed the no of deaths by between 241 and -209 per year. However there is net migration of population in to the Vale of Glamorgan is now again significantly lower than previous estimates at **217** per year. **Thus in the years 2006 to 2008 to 2011, the projected inward migration has been reassessed and downsized from 815 to 547 to 217 per year.**

In view of this level of downsizing of estimates, and likely continuing very slow economic growth for many years ahead due to global economic reasons (the continuing rise of China, India, SE Asia) and domestic ones (National debt and weak economic performance) we are very unlikely of requiring levels of extra housing in the Vale of Glamorgan beyond those already achieved operative for the next 5 years. **This planning application is for the building of houses for which there is no current need. Any justification for permitting this development on the basis of housing need flies in the face of the Welsh Government's own projections.**

- 3 This proposed development would have major consequences on A48 traffic.** St Nicholas does not have many essential facilities such as a shop, post office, doctor's surgery, public house etc and as a consequence any housing development would entail frequent short car journeys by residents, given the very limited public transport facilities. **This is contrary to Objective 3 and to the objective expressed in paragraph 7.12 of the LDP.** The centre of the village is frequently packed with parked cars, particularly at school times and this already presents great danger to children and adults. The roads are very narrow and lack pavements - indeed it is frequent that cars have to reverse in order to pass in opposite directions. The exits from the north side of the village on to the A48 are blind and difficult to negotiate. Joining the A48, particularly when turning to the West is difficult at the best of times and extremely difficult during the prolonged morning and evening rush hours. The proposed

development of 101 houses would the ingress and egress of up to 200 cars daily. These would present a very significant hazard to the voluminous traffic traversing St Nicholas, especially for cars turning to the right either onto the A48 or exiting the A48. The capacity of the A48 has been calculated wrongly by estimating it at the points between Cowbridge and Culverhouse cross that have a (deregulated) 60 mph speed limit. The traffic flow slows considerably through St Nicholas (which has a 30 mph speed limit). The A48 is already at overcapacity through St Nicholas. **I object to this planning application as the addition of a substantial number of cars entering and leaving the A48 at St Nicholas would cause substantial further disruption, delay and possible danger in a situation that is already very close to gridlock.**

- 4 **Delay by the VOGC in responding to the Welsh Government** The Welsh Government's response to the VOGC Revised deposit LDP in their letter of 20 December 2013 (refs: QA980858 & P/POL/AMW/LDP3) states that:

The current consultation on the Draft Planning Bill makes reference to end dates of development plans, after which it is proposed they no longer remain extant. This would apply to the Vale of Glamorgan's Unitary Development Plan (UDP) which expired in 2011. This could result in the authority having no extant development plan in place to make decisions before adoption of the LDP. It is therefore imperative that LDP preparation moves forward as swiftly as possible incurring no further delay. We would wish to avoid a situation where your local authority is in a vulnerable position for an extended period of time. The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. I have considered the Deposit LDP in accordance with the consistency/coherence tests, and principally in accordance with whether satisfactory regard has been given to national planning policy (test C2). **The Welsh Government's representations are separated into 4 categories which are supported with more detail in the attached annex.**

The annex states:

d) Spatial Strategy -Policy MG 2

It is unclear how the role and function of settlements has been reflected with regard to the scale of housing proposed. While the scoring matrix focuses on 'functional links' (Sustainable Settlements Appraisal 2013) the services and facilities in many of the minor rural villages themselves appear poor. Allocations in some minor rural settlements, for example, 100 units at St Nicholas and 120 units at Bonvilston appear disproportionate to current services and facilities. The proposed level of housing provision has increased in totality within Minor Rural Villages from 787 units in the first Deposit Plan to 946 units. Further clarification is needed to explain whether provision matches need in the appropriate locations and how the proposed allocations align with the objectives of the plan. For example, scale of growth and commuting patterns. We consider that the proposed spatial distribution could potentially encourage reliance on the car and compound infrastructure problems in rural locations. **While it is acknowledged that one of the aims of the plan is to support facilities in minor rural villages, it is not clear that the rationale for allocating over 940 units in such areas has been fully evidenced.** The level of housing provision in Barry has reduced significantly from 3052 units from the previous Deposit Plan to 2360 units. **The current spatial distribution is potentially in conflict with Key Objectives 2 and 3 of the LDP. It may be necessary to allocate additional housing sites in the Key and Service Centre Settlements.**

The Welsh Government is clearly opposed to developments on this sort of scale and urges the VOGC to deal expeditiously with the stalled LDP, urging (my bold italics) that:

It is therefore *imperative* that LDP preparation moves forward *as swiftly as possible incurring no further delay*. We would wish to avoid a situation where your local authority is in a vulnerable position for an extended period of time. *The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine.*

Approval of this application in advance of the completion of due process on the LDP would make nonsense of all the work of members of the public in participating in the statutory consultation and representation at the Inspector's hearings. Their representations should and must be properly considered by VOGC and the Inspector before any application relating to MG2 43 is approved by VOGC. I object to this planning application as permitting it would act in contempt of the due process that is currently in operation by subverting the Inspector's role, position and influence.

At packed public meetings in St Nicholas on 19 March 2012 & 2 December 2013, plans to allocate land to the East of St Nicholas for housing development were unanimously opposed, and on 22 March 2015 there was unanimous opposition at a packed public meeting to the original planning application for 79 houses. This opposition applies equally or more to the current application for 101 houses.

This planning application conflicts with many policies as indicated above and has multiple basic flaws. It is out of order and in breach of UDP policies. This planning application cannot rely on inclusion of the site as part of MG 2 [43] until my objections and those of others to the site's inclusion in the LDP have been properly considered by the VOGC and the Inspector prior to adoption of a revised LDP, as is the clear wish of the Welsh Government.

For the above reasons, I object to this planning application and request the Council to refuse planning permission for this application and any other that made relate to all or part of MG 2 [43] until the formal adoption of the revised LDP following the Planning Inspector's decision on the soundness of the revised LDP.

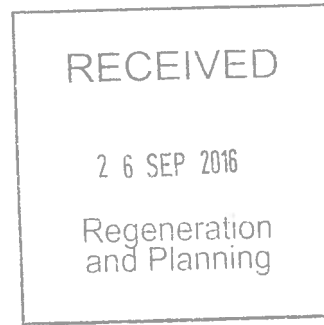
Yours sincerely

Dr Paul Williams

11 Ger-y-Ilan
St Nicholas
Vale of Glamorgan
CF5 6SY

16 April 2016

Mr Steven Rennie
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry CF63 4RT



Dear Mr Rennie

**Planning Application by Redrow Homes: Land to the East of St Nicholas: LDP Site MG2 [43]
11 March 2016: Amended proposal to build 101 houses Your ref: 2015/00249/FUL/SR2**

I refer to my previous letters regarding the above planning application and am writing with 2 further objections, to be added to those made previously made by me in my earlier correspondence.

- 1 The removal from the earlier applications of open space for any children to play in leaves insufficient space for the massive scale of development proposed. This is seemingly because of the alleged availability of the St Nicholas school playing field, which is in fact not accessible out of school hours. I object to the omission of this playing area as it might lead to the dangerous situation of children playing in the narrow roads of the proposed development or the narrow roads of the village.
- 2 The road leading west from the land to Ger-y-Ilan (the road past Nos 11, 12 and 14 Ger-y-Ilan) is an unadopted road and not a public right of way. On close examination the Amended site plan of 3 March 2016 shows a new pedestrian gateway from the land into this road. There is furthermore a proposal in Section 3 of the *Revised design and access statement* for provision of pedestrian and cycle access to Ger-y-Ilan via this unadopted road. The owners of the land only have limited rights of access to the field via this unadopted road. There is no automatic access to this road from the residents of this massive proposed development. The proposed use of this unadopted road for access to Ger-y-Ilan by those living in 121 houses would certainly not cause **minimal neighbour impact within the site and surrounding properties** as is claimed in Section 4. It would cause a major disturbance to the amenity of the occupiers of the above 3 properties and to all the other residents of Ger-y-Ilan. I thus object to the proposal to permit this pedestrian and cycle access to Ger-y-Ilan via this route.

As previously stated this planning application conflicts with many Vale of Glamorgan planning policies, has multiple basic flaws, is out of order and in breach of stated planning policies.

I would be most grateful if you would acknowledge receipt of this further letter of objection.

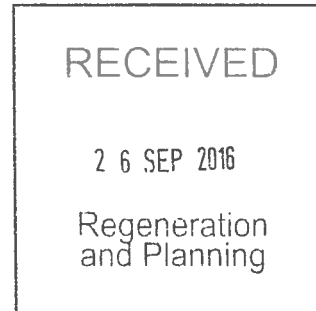
Yours sincerely

Dr Paul Williams

11 Ger-y-llan
St Nicholas
Vale of Glamorgan
CF5 6SY

25 September 2016

Mr Steven Rennie
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry CF63 4RT



Dear Mr Rennie

Dear Mr Rennie

Planning Application by Redrow Homes: Land to the East of St Nicholas: LDP Site MG2 [43] 12 September 2016: Amended proposal to build 100 houses Your ref: 2015/00249/FUL/SR2
<http://vagonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2015/00249/FUL>

I refer to my previous letters regarding the above planning application (2 of the recent ones attached).

I wish to reiterate all of the objections that I have made to this proposed development in the past.

I am writing with 2 further objections, to be added to those made previously by me:

- 1 The proposals do not include any plan to respect the privacy of my garden. The document **1537-01J Planning Layout St Nicholas.pdf** does not show any proposal to place a fence or wall in-between my garden and the new proposed development. The existing hedgerow between myself and the field appears to be the sole barrier between myself and the new housing. The existing hedgerow is made of deciduous plants. From November to June the absence of leaves in this hedge thus means that it is possible to see straight through it. This does not matter when the area to the North and East of the garden is open countryside. If this should be built upon then occupants of houses surrounding the garden on these sides would have an open view into my garden through the hedge. It is thus necessary for the developers to include in their plans a new fence or wall to be built to surround the existing hedge in order to preserve the privacy hitherto existing.
- 2 The road leading west from the land to Ger-y-llan (the road past Nos 11, 12 and 14 Ger-y-llan) is an unadopted road and not a public right of way. The amended site plan of 3 March 2016 showed a new pedestrian gateway from the land into this road. There is furthermore a proposal in Section 3 of the *Revised design and access statement* for provision of pedestrian and cycle access to Ger-y-llan via this unadopted road. The current plans show drop-down bollards as replacements for the existing gate leading into the field. The owners of the field only have limited rights of access to the field via this unadopted road. There is no automatic access to this road from the residents of this massive proposed development. The proposed use of this unadopted road for access to Ger-y-llan by those living in 117 houses would certainly not cause **minimal neighbour impact within the site and surrounding properties** as is claimed in Section 4. It would cause a major disturbance to the amenity of the occupiers of the above 3 properties and to all the other residents of Ger-y-llan. I would suggest that erection of

a wall at the site of the existing gate would be the minimum requirement to enable there to be caused '**minimal neighbour impact within the site and surrounding properties**'. I thus object to the proposal to permit this pedestrian and cycle access to Ger-y-llan via this route.

As previously stated this planning application conflicts with many Vale of Glamorgan planning policies, has multiple basic flaws, is out of order and in breach of stated planning policies.

I would be most grateful if you would acknowledge receipt of this further letter of objection.

Yours sincerely

Dr Paul Williams

Payne, Adrienne J

From: Planning
Sent: 16 September 2016 14:02
To: Planning
Subject: New comments for application 2015/00249/FUL

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas from Mr Peter Lindsay Gray [REDACTED]

Address:
Pheasant Rise, Cowbridge Road, St Nicholas, Cardiff, CF5 6SH

Comments:
I object strongly to the proposals for two fundamental reasons:

1. Unlike most villages in the area, there is no shop, no pub and very little in the way of social infrastructure. In addition, the school is full and oversubscribed.
2. Enormous pressures would be placed on the A48 which already suffers badly from the build up of traffic at peak times on this section of the main access road into Cardiff from Cowbridge and surrounding areas.

Case Officer:
Mr. Steven Rennie

RECEIVED
16 SEP 2016
Regeneration
and Planning

D.E.E.R
RECEIVED
ACTION BY: <i>EMM SDB</i>
NO: <i>2</i>
ACK:

Payne, Adrienne J

From: Planning
Sent: 25 September 2016 15:08
To: Planning
Subject: New comments for application 2015/00249/FUL

RECEIVED
26 SEP 2016
Regeneration
and Planning

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas

from Mr Neal Benford [REDACTED]

Address:
2 broadway green ,st nicholas,cf56sr

Comments:
as with all of the previous applications I OBJECT to this development on the grounds that it will detrimentally change the village, which is the gateway to the Vale and also that this will have an adverse effect upon road traffic on the A48, which is already too busy during peak times.

Case Officer:
Mr. Steven Rennie

D.E.E.R
RECEIVED
ACTION BY: SDB
NO: 18
ACK:

Payne, Adrienne J

From: Planning
Sent: 26 September 2016 15:44
To: Planning
Subject: New comments for application 2015/00249/FUL
Attachments: Redrow Planning Objection (2).doc

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas

from Mr Cliff Lewis [REDACTED]

Address:
Village Farmhouse, St. Nicholas, Cardiff, CF5 6SG

Comments:
Please see my attachment for letter objecting to this development.

Yours Faithfully
Cliff Lewis
Sandra Lewis

The following files have been uploaded:
Redrow Planning Objection (2).doc

Case Officer:
Mr. Steven Rennie



D.E.E.R
RECEIVED
ACTION BY: <i>SAB</i>
NO: <i>10</i>
ACK:

Mr. Cliff Lewis,
Village Farmhouse,
St. Nicholas.
Cardiff.
CF5 6SG.
Email:- [REDACTED]



26th September 2016.

Planning Application by Redrow Homes (South Wales) Limited - Land to the East of St Nicholas

I wish to object to the planning application dated 9 March 2015 submitted on behalf of Redrow Homes (South Wales) Limited ("Redrow") under your references 2015/00249/FUL/SR2

References in this letter to "the LDP" relate to Deposit Local Development Plan of the Vale of Glamorgan Council ("the Council") dated November 2013. References to "Policy MD *" relate to the draft policies of the Council as set out in the LDP.

The grounds of my objection are as follows:

1. Application is premature. The LDP is currently being processed by the Council in accordance with statutory procedures. Numerous representations and objections to the proposals in the LDP, both generally and specifically relating to land to the East of St Nicholas which is the subject of the Application ("the Site"), have been submitted by members of the public. These representations and objections, many of which identify alleged errors, inaccuracies and unsound or unsustainable conclusions in the LDP, have not yet received due consideration by the Council and have not yet been examined and considered by the Inspector to be appointed by the Welsh Government to consider the LDP ("the Inspector").

Although the Site forms part of allocated site number MG 2 - 43 ("MG 2 - 43") in the LDP, powerful representations have been made to the Council in support of the contention that MG 2 - 43 should be deleted from the LDP. Whatever alleged legal loopholes Redrow is seeking to exploit by submitting the Application at this time, it would be an outrageous abuse of due process for planning permission to be granted for the Site in advance of proper consideration of the representations by the Council and the Inspector prior to eventual adoption of the LDP (as revised).

It has been confirmed by the Council in a pre-application response to Harmers Limited dated 5 February 2014 under reference P/DC/SR2/2013/0200/PRE that no deficiency now exists in the Council's five year housing land supply. Thus, there is no justification for bringing forward the Site based on its inclusion as part of an allocated site in advance of formal adoption of the LDP, as revised following completion of all due processes.

The Application is premature and should not be considered or approved on the basis that the Site forms part of MG 2 - 43.

Nevertheless, in case the Council does not accept this contention and as the Application relies in certain respects on details in the LDP, I will refer to some of those matters below without prejudice to the overriding contention that the Application is premature and should be refused.

2. Contrary to adopted Unitary Development Plan. Prior to the adoption of the LDP (as revised), the Application should be considered in the context of the adopted Unitary Development Plan 1996-2011 ("the UDP"). The proposals in the Application are in breach of policies in the UDP, including the following:

a. Dwellings in the Countryside (HOUS 3). The policy is that "The erection of new dwellings in the countryside will be restricted to those that can be justified in the interests of agriculture and forestry." The Application proposes to turn agricultural land into a housing development which has no benefit to agriculture or forestry. On the contrary, it removes valuable agricultural land.

b. Development in the Countryside (ENV 1). The Site is situated in open countryside. The proposed development does not meet any of the four exceptions to the policy that development in the countryside will not be permitted.

c. Agricultural Land (ENV 2). The policy provides that "The best and most versatile agricultural land (grades 1, 2 & 3A) will be protected from irreversible development, save where overriding need can be demonstrated." The land comprising the Site is officially designated as grade 2 although it is claimed by Redrow that the correct designation is grade 3A. Even if Redrow is correct, the adopted policy requires protection of the land. There is no current overriding need for the development.

d. Conservation in the Countryside (ENV 10). The policy provides that "Measures to maintain and improve the countryside, its features and resources will be favoured, particularly in ... areas subject to development pressure ...". The residents of St Nicholas have chosen to live in a rural community and, particularly the residents of Ger-y-Llan and Well Lane, enjoy the benefit of an outlook over green fields. If the proposed development proceeds, that outlook will be irreversibly changed to an urban scene of relatively dense housing. Notwithstanding the proposed landscaping, substantial wildlife habitat will be lost. The proposal does not maintain or improve the countryside and is contrary to ENV 10.

3 The Site lies outside the defined settlement boundary of St Nicholas in a Special Landscape Area. **There is no overriding justification or material consideration to outweigh the in principle policy presumption against development of the Site. The development of this rural area and landscape would be contrary to the adopted policies of the Council as identified above.**

3 The scale would be substantially out of proportion to the size of the existing village of St Nicholas, much of which is in a Conservation Area.

The core village of St Nicholas has 144 houses of which 77 are on the north side of the A48 which runs through the centre of the village and 67 houses on the south side. Of the 144 houses, 105 houses are in the post-2009 Conservation Area, 32 houses were in the pre-2009 Conservation Area but excluded in 2009 and 7 houses are located between the Conservation Area and the commencement of the 30 mph speed limit at the western end of the village.

A development of 100 houses would increase the size of the core village by 69% and the north side by 130%.

This represents a massive scale of development for a small rural settlement.

In its representations to the Council on the LDP, the Welsh Assembly Government ("WAG") stated "**Allocations in some minor rural settlements, for example, 100 units at St Nicholas and 120 units at Bonvilston appear disproportionate to current services and facilities.**" (paragraph B.1(d) of the Annex to the letter dated 20 December 2013 under the Council's reference P/POL/AMW/LDP3).

The scale of the proposed development, is wholly disproportionate to the size of the current village.

4. Urbanisation of open countryside. Paragraph 4.10.1 of *Planning Policy Wales* dated July 2014 ("PPW") states "...considerable weight should be given to protecting [agricultural land of grades 1, 2 and 3A] from development because of its special importance. Land in [these grades] 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...". There is no overriding need for housing development in St Nicholas or the East Vale (designated in Figure 1.1 of the *Local Housing Market Assessment 2013*) ("the LHMA") as confirmed in Table 6.13 of the LHMA. Any need for housing elsewhere in the Vale of Glamorgan could be provided on brownfield land (eg Llandow) or land of lower agricultural grade. The proposed site allocation on grade 2 (or grade 3A) agricultural land **conflicts with paragraph 4.10.1 of PPW.**

4 Paragraph 4.7.8 of PPW recognises that minor extensions in the countryside to existing settlements may be acceptable. An increase of 69% in the number of houses in St Nicholas cannot be described as a "minor extension". The proposed development **conflicts with paragraph 4.7.8 of PPW.**

5. Out of character with the existing minor rural settlement. St Nicholas is a minor rural settlement in the Vale of Glamorgan which has developed gradually over many centuries.

The proposed development of 96 houses on (including the land allocated for open space) would not be of an appropriate scale and density for its location and it would not make a positive contribution to the local environment **contrary to paragraph 7.5 of the LDP.** Such development would not be "...of a scale appropriate to its location." **contrary to paragraph 4.5 of the Deposit LDP.**

The site is adjacent to, and any development would impact directly on, six remaining houses (following the proposed demolition of Emmaville) on the north side of the A48, eight houses on the east and north sides of Ger-y-Llan and one house in Well Lane. The proposed main access to the Site would have a very serious impact on the adjacent properties known as Kingfauns and Green Meadow. The proposed use of the private unadopted road which links the Site to Ger-y-Llan and services 11, 12 & 14 Ger-y-Llan ("the Estate Road") for pedestrian and cycle access to the Site would have a major adverse impact on those properties. The proposed development would have a serious adverse impact for all these properties on the existing residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance **contrary to paragraph 7 of Policy MD 2 and paragraph 4 of Policy MD 3.**

The properties on the north side of the A48 form part of the Conservation Area of St Nicholas. Most of the directly affected houses occupy plots substantially larger than the proposed dense development of 21.6 houses per hectare which includes access, roads and other common facilities. Similarly, the adjacent houses in Ger-y-Llan and Well Lane have a substantially lower density. **The proposed development is contrary to paragraph 2 of Policy MD 2.**

The Site is located at the eastern approach to St Nicholas on the north side of the A48. Instead of seeing an established conservation village on entry from the east, travellers would be greeted by a substantial and dense urban development

entirely out of character with the existing village and Conservation Area. The proposed development does not respond appropriately to the local context and character of neighbouring buildings in terms of type, form, scale, mix and density **contrary to paragraph 2 of Policy MD 3.**

5 Paragraph 4.7.8 of PPW states "All new development should respect the character of the surrounding area and should be of appropriate scale and design." For reasons described in this item and in item 3 above and item 6 below, the proposed development at the entrance to the Conservation Area of St Nicholas **does not comply with paragraph 4.7.8 of PPW.**

In summary, the proposed development of the Site would be contrary to paragraphs 2 and 7 of Policy MD 2, paragraphs 2 and 4 of Policy MD 3 and paragraph 4.7.8 of PPW. St Nicholas does not have the capacity to accommodate this proposed development without its having an unacceptable effect on its character **contrary to paragraph 5.44 of the LDP.**

6. Contrary to Policy MD 6 – Development within Minor Rural Settlements. The relative scale and density of the proposed development substantially **conflicts with Policy MD 6.** It would not have a distinct visual relationship with the existing settlement (contrary to paragraph 1); it would not be of a scale and character that is sympathetic to and respects its immediate setting and wider surroundings (contrary to paragraph 2); it would have an unacceptable impact on the character and appearance of the [existing] settlement (contrary to paragraph 3); it would represent a visual intrusion into the countryside (contrary to paragraph 4); and it would not be consistent with Policies MD 2 and MD 3 (contrary to paragraph 8).

The proposed development would not reinforce the role and functions of the settlement or maintain its character and attractiveness **contrary to paragraph 7.28 of the LDP.** A relatively dense development of 96 houses would not be of an appropriate scale that is sympathetic to and respect the existing character of the village and the range of services and facilities that are available **contrary to paragraph 7.29 of the LDP.** A development on the scale proposed would not represent a small scale extension to the settlement also **contrary to paragraph 7.29 of the LDP.** Such a development would be unrelated to the existing properties and settlement and would represent an incongruous and large scale extension of the built form into the open countryside **contrary to paragraph 7.30 of the LDP.** The allocated site is green field and any development would result in the loss of open space which currently contributes at its entrance to the character and setting of the Conservation Area village **contrary to paragraph 7.31 of the LDP.**

7. Services and facilities. St Nicholas has a church, chapel, primary school, church hall, post box and a half-hourly bus service (substantially less frequent in the evening and on Sunday - not properly reflected in paragraph 2.17 of the Transport Statement) to Cardiff and Cowbridge (and beyond). The bus service is infrequent and expensive. It is unlikely to be used for most journeys to Culverhouse Cross or Bonvilston.

6. St Nicholas does not have a post office, shop, doctor's surgery, nursery, public house, restaurant, leisure centre or library. The absence of these facilities will inevitably result in the need for the residents of the new houses to make frequent short car journeys to shops 1.5 miles away at Culverhouse Cross or to a shop, public house or restaurant over two miles away at Bonvilston. The nearest doctors' surgeries are in Ely (2.2 miles) and Cowbridge (7 miles). The nearest post office is in Wilson Road, Ely (2.8 miles). It is unrealistic to expect these journeys to be made by walking or cycling by the vast majority of the residents, particularly the elderly. The return journey from Culverhouse Cross involves climbing the long steep hill known as The Tumble.

The absence of these frequently used services in the village and the consequent necessity to make frequent short car journeys is **contrary to Objective 3 and to the objective expressed in paragraph 7.12 of the LDP.**

7. Planning history. It is claimed at paragraph 2 of the Planning Statement that there is no planning history for the Site. This is incorrect. Two planning applications for the construction of houses on part of the Site were refused by the Council. The first application for the construction of ten houses was refused on 10 January 1989 although the Council's reference is unknown. The second application to build six houses was refused on 22 May 1991 under reference 1988/01152/OUT. The grounds for refusal of permission for the construction of six or ten houses apply to a far greater extent for the proposed construction of 79 houses.

8. Village road capacity. The centre of the village (north of the A48) is often heavily congested with parked vehicles, particularly in the roads around the church immediately before the weekday opening and closure of the school. Similar congestion occurs when there is a wedding or funeral at the church. The roads in the north side of St Nicholas are wholly unsuitable for any of the additional traffic which would be generated by the proposed development.

There is no pavement on the roads around the church. It is particularly unsuitable and dangerous for young children and any disabled person on the roads to the north and east of the church. There is no room for a wheelchair on the road to the north where vehicles are usually parked leaving barely enough room for other vehicles to squeeze through. Photograph 2 in the Transport Statement shows the east side of School Lane to be traffic free. (Photographs illustrating the congestion of parking in St Nicholas, particularly in the north side of School Lane including the north east corner, are Shown in attached file).

Traffic travelling in either direction along School Lane has to negotiate a blind bend at the junction with Well Lane in the north east corner of School Lane. This is particularly dangerous when vehicles are parked on the bend as is frequently the case. The exit from Ger-y-Llan is also blind and dangerous as vehicles travelling south on School Lane pick up speed.

8. Main access to Site. The location of the proposed access to the Site is inside the Conservation Area and some distance to the west of that proposed in MG 2 - 43. Paragraph 4.7 of the Transport Statement estimates that 32 vehicles will exit the Site in the peak morning period. Paragraph 4.10 asserts that there will be no queue of vehicles entering or exiting the Site during this period. This estimate and this assertion are questioned. The 96 houses with an estimated average of two vehicles per house would amount to 192 vehicles excluding visitors and service vehicles. A substantially greater proportion of the vehicles is likely to exit the Site in the peak morning period, without taking account of visitors and service vehicles.

9. Paragraphs 3.10 to 3.13 of the Transport Statement set out proposals for changes to the highway layout near the access to the Site. The A48 from Culverhouse Cross is derestricted for 1.1 miles as far as the eastern end of the village then has a 30 mph speed limit through St Nicholas commencing only 100 metres from the access to the Site. Figure 9 and Appendix F of the Transport Statement do not indicate any proposal to extend the 30 mph limit further east. Whether or not there is any extension, traffic from the east frequently enters St Nicholas outside peak periods at speeds much greater than 30 mph. Traffic leaving the Site to turn west towards Cowbridge would experience difficulty and danger due to the traffic flow in both directions.

At peak periods, it would be difficult for the significant number of vehicles leaving the proposed development to enter the traffic flow in either direction, thus causing a tailback within the Site.

Experience of leaving School Lane (eastern exit) to travel in either direction at peak periods demonstrates the extent of the problem even though it is substantially mitigated by being in the centre of the restricted speed zone and having the intermittent benefit and protection of the traffic lights turning red at the adjacent junction with Duffryn Lane. This forces through traffic to stop and provides the opportunity for vehicles from School Lane to enter the traffic flows. These mitigating factors would not apply to traffic exiting the Site.

Considerable additional problems affecting traffic flow on the A48 will arise during the construction period lasting at least two years.

10. Pedestrian and cycle access to Site. Section 7 of the Design and Access Statement together with the Site Plans provide for a pedestrian and cycle access to the Site via Ger-y-Llan and the Estate Road. While Ger-y-Llan is an adopted road, the Estate Road is unadopted. The owners of the properties known as 11, 12 & 14 Ger-y-Llan ("the Three Properties") require the Estate Road for access to the Three Properties and have an obligation to pay a fair and reasonable share of the costs of maintenance and repair of the Estate Road. No approach has been made by or on behalf of Redrow to the owners of the Three Properties concerning the proposed use of the Estate Road.

The use of Ger-y-Llan and the Estate Road by the residents of 100 properties for pedestrian and cycle access to the Site is inappropriate. Such use would have a considerable impact on the amenity of the residents of Ger-y-Llan, particularly the residents of the Three Properties.

There is also a risk that the Estate Road will be used by residents of and visitors to the Site for unauthorised parking. The tarmac section of the Estate Road is not wide enough for parking without causing considerable difficulty to the residents of the Three Properties in entering and leaving those properties.

As described at item 10 above and illustrated in Appendix D, the proposed pedestrian and cycle route to the centre of the village and, particularly, to the school is unsuitable and very dangerous for young children.

11. Highways and traffic congestion. Section 4 of the Transport Statement seeks to demonstrate that the proposed development will have little impact on traffic travelling on the A48. This is disputed for reasons set out at item 11 above. Of greater impact will be the cumulative effect of this proposed development together with other developments proposed in the LDP near Cowbridge (including Ystradowen and Colwinston) and between Cowbridge and Culverhouse Cross (including Bonvilston). In addition to these proposed developments, there are other significant proposed changes which will increase the traffic on the A48 and at the Tesco junction and Culverhouse Cross roundabout.

The Application relies on the inclusion of the Site as part of an allocated site in the LDP. It is contended that this allocation, in combination with the other allocations referred to above, has been made without due consideration and regard by the Council to the cumulative effect on traffic on the A48. In particular, it is contended that, in formulating the LDP and determining site allocations at St Nicholas and Bonvilston, the Council has very seriously misinformed itself concerning the capacity of the A48. This capacity has been calculated at three points between Cowbridge and Culverhouse Cross, all of which are in the national 60 mph speed limit. No account has been taken of the 40 mph speed limit from West Bonvilston to West St Nicholas; the 30 mph speed limit through St Nicholas; and the inevitable delays at the traffic lights at Sycamore Cross and Duffryn Lane as well as at other uncontrolled junctions.

12. Sustainable Settlements Appraisal and Site Assessments. Paragraphs 6.13 to 6.21 (with Appendix B) of the Planning Statement seek to rely on the results, so far as they apply to the Site, of the three stages of the Sustainable Settlements Appraisal and Site Assessments carried out by the Council in the preparation of the LDP. These three stages resulted in the inclusion of the allocated site MG 2 - 43.

It is contended that there were serious errors, defects and inappropriate scoring at all stages of the Appraisal and Assessments leading to the wrongful and unsupported inclusion of MG 2 - 43 in the LDP. Full details of this contention have been set out at items 13 to 15

13. Wrongful inclusion of the Site in the LDP. It is contended that, in view of serious inaccuracies, misinformation and errors by the Council (as described at items 13 & 14 above) in the preparation of the LDP directly affecting the inclusion of the Site as part of MG 2 - 43, the Application cannot rely on such inclusion until my representations and those of other members of the public have been fully and properly considered by the Council and the Inspector prior to adoption of the LDP (as revised).

For the many reasons set out above, I object to the Application and request the Council to refuse planning permission in response to the Application and to refuse any other planning application relating to all or part of MG 2 - 43 prior to the formal adoption of the LDP (as revised).

Yours sincerely
Cliff Lewis
Sandra Lewis

Payne, Adrienne J

From: Planning
Sent: 01 October 2016 21:46
To: Planning
Subject: New comments for application 2015/00249/FUL
Attachments: 2015_00249_FUL_SR2_SMCCurien_The Croft_StNicholas_October16.pdf

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas from Ms Sophie Curier [REDACTED]

Address:
The Croft,,Cowbridge Road,,St Nicholas,CF56SH

Comments:
I strongly object to this development. Detailed comments attached.

The following files have been uploaded:
2015_00249_FUL_SR2_SMCCurien_The Croft_StNicholas_October16.pdf

Case Officer:
Mr. Steven Rennie

RECEIVED
03 OCT 2016
Regeneration
and Planning

DEER
RECEIVED
ACTION BY: SDB
NO: 14
ACK:

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



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

1st October 2016

Dear Mr. Rennie,

Ref: - Application No. 2015/00249/FUL/SR2 Development of 100 houses and associated open space vehicular and pedestrian access, landscaping and infrastructure, including the demolition of Emmaville.

In response to your letter reference P/DC/SR2/2015/00249/FUL dated 12th September 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.

The file "Planning layout Rev L with tracking" created on 26th September presents a proposed development of 100 buildings with the associated ~ 200 cars on 3.65 ha of high quality (good) agricultural land at the boundary a rural village of ~ 144 houses. When considered with the adjoining proposed development of 17 houses as indicated in file "Layout including adjacent proposed development" we can see how the village of St Nicholas would radically be changed for the worse if this development was to be realised.

The reasons for my objection are as follows:-

Application is premature.

The LDP is currently being considered by the Council at present. A number of representations and objections to the proposals in the LDP, both generally and specifically relating to land to the East of St Nicholas, which is the subject of the current application, have been submitted by members of the public. Until this review has been conducted it would seem to be premature to make any form of determination on this proposal.

Inconsistent with the objectives of the LDP Vision document.

This proposed development 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 site 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 Conservation 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 principal 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. In practice as observed by the speed survey conducted by Vectos ("16.08.12 Vectos report.pdf_Highway report") this is frequently not obeyed with average speeds of ~40mph being recorded. 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 minutes 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 could be used support further "unsustainable" developments in the St Nicholas area.

In conclusion, it would be premature to make a determination on this application while the LDP is under review. 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,

Sophie Curien

Payne, Adrienne J

From: Planning
Sent: 01 October 2016 21:18
To: Planning
Subject: New comments for application 2015/00249/FUL
Attachments: 2015_00249_FUL_SR2_JMacneil_The Croft_StNicholas_October16.pdf

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas from Mr John Macneil [REDACTED]

Address:
The Croft,,Cowbridge Road,,St Nicholas,CF56SH

Comments:
I strongly object to this development. Detailed comments attached.

The following files have been uploaded:
2015_00249_FUL_SR2_JMacneil_The Croft_StNicholas_October16.pdf

Case Officer:
Mr. Steven Rennie

RECEIVED
03 OCT 2016
Regeneration
and Planning

D.E.E.R
RECEIVED
ACTION BY: <i>BARBARA SOB</i>
NO: <i>13</i>
ACK:



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 October 2016

Dear Mr. Rennie,

Ref: - Application No. 2015/00249/FUL/SR2 Development of 100 houses and associated open space vehicular and pedestrian access, landscaping and infrastructure, including the demolition of Emmaville.

In response to your letter reference P/DC/SR2/2015/00249/FUL dated 12th September 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.

The file "Planning layout Rev L with tracking" created on 26th September presents a proposed development of 100 buildings with the associated ~ 200 cars on 3.65 ha of high quality (good) agricultural land at the boundary a rural village of ~ 144 houses. When considered with the adjoining proposed development of 17 houses as indicated in file "Layout including adjacent proposed development" we can see how the village of St Nicholas would radically be changed for the worse if this development was to be realised.

The reasons for my objection are as follows:-

Application is premature.

The LDP is currently being considered by the Council at present. A number of representations and objections to the proposals in the LDP, both generally and specifically relating to land to the East of St Nicholas, which is the subject of the current application, have been submitted by members of the public. Until this review has been conducted it would seem to be premature to make any form of determination on this proposal.

Inconsistent with the objectives of the LDP Vision document.

This proposed development 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 site 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;
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- Absence of demand for affordable housing in the area;
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- Disruption of traffic on and in the vicinity of the A48 in St Nicholas;
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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 principal 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;

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In conclusion, it would be premature to make a determination on this application while the LDP is under review. 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

Payne, Adrienne J

From: Planning
Sent: 02 October 2016 21:01
To: Planning
Subject: New comments for application 2015/00249/FUL

New comments have been received for application 2015/00249/FUL at site address: Land to the East of St. Nicholas from Mr Roger Grew [REDACTED]

Address:
1 Merrick Cottages, St Nicholas, CF 5 6SQ

Comments:
All the comments contained in my letter regarding the original application still stand. As do comments I made online regarding others. Redrow are just trying to wear us down. An extra 100 houses onto our small village continues to be a ludicrous proposition. It would also open the floodgates.

Case Officer:
Mr. Steven Rennie

RECEIVED
03 OCT 2016
Regeneration
and Planning

D.E.E.R
RECEIVED
ACTION BY: ~~AWMA~~ SOB
NO: 23
ACK:

Payne, Adrienne J

From: [REDACTED]
Sent: 03 October 2016 08:56
To: Planning & Transportation (Customer Care)
Subject: REDROW PLANNING APPLICATION - ST.NICHOLAS
Attachments: VOG COUNCIL ST NICHOLAS .pdf

Dear Sir/Madam,

Would you please click the attached PDF which refers to the Redrow Planning Application for housing at St.Nicholas.

Yours faithfully,

Robert Davidson

RECEIVED
03 OCT 2016
Regeneration and Planning

D.E.E.R
RECEIVED
ACTION BY: SDB
NO: 27
ACK:

To:>

From:>

REGARDING: APPLICATION BY REDROW FOR NEW HOMES AT ST.NICHOLAS.

Dear Members of the Planning Committee,

I note that you are reviewing an application by Redrow Homes for a development at St.Nicholas. Whilst not happy to see such a development in the Vale of Glamorgan, may I suggest that in the event that you do grant planning permission, that you insert a condition that the the actual design of any dwellings on this site must be more in keeping with the vernacular architecture of the Vale of Glamorgan. As such, this does not include red brick but should have render and perhaps limestone.

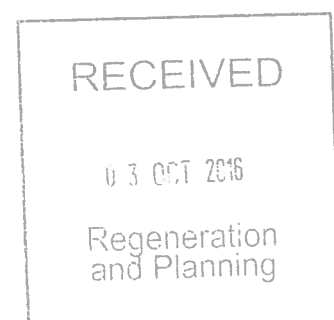
Redrow state that houses on this development will be from their 'Heritage Range'. Their Heritage Range has nothing to do with the heritage of the Vale of Glamorgan. In fact, the designs seem to be modern replicas of those put up in the 1930's in vast suburbs around British cities. You have already allowed these suburban type dwellings in the lovely village of Colwinston – see picture below:>



Also note that the garages are 1930's size and totally unsuitable for modern cars. This leads to street clutter as residents park cars on driveways or the street.

These houses look totally out of place in Vale villages.It is a great shame that the Vale of Glamorgan Planning department seem to think that this is acceptable.

Continued:> > >



The photo (below) shows the Redrow development at Wenvoe. Houses that are totally out of keeping with the Vale of Glamorgan and with useless garages leading to on street parking. Perhaps the Council think they will use the garages for their bicycles so they can use your new cycle route along the fume filled A4050?



At Colwinston, where Redrow have used stone, they have failed to match it up to the natural limestone found throughout the Vale of Glamorgan. The photograph below shows this:>



May I suggest the the Council require the house building companies to respect the local heritage of the Vale of Glamorgan. Fortunately, a local builder, JRS, has indeed done this with a development at Creigiau. Look at the two examples below which show the type of dwellings that I think would not look out of place in the VOG:>



Note the use of render and limestone along with slate (or fake slate) roofing.

The St. Lythans Park development (Bellway) is another of these awful estates of red brick houses that owe nothing to the heritage of the VOG. Instead of making a feature of the Beech Tree Inn (limestone) with perhaps a 'village green' created on the housing side with direct access, new houses are rammed right up against the boundary (next photo) and the residents have to venture out onto the road from St. Lythans in order to gain access.



Furthermore, the residents of St. Lythans Park do not have direct pedestrian access to M&S and Tesco as well as the buses on the A48 to Cowbridge, Bridgend and Porthcawl. This means that they have to walk the long way around via the A4050 and Culverhouse Cross. Clearly, most will get in their cars and have to negotiate the overloaded Culverhouse Cross Interchange. So much for being 'sustainable'!

I trust that my comments regarding house design will be taken into account when you consider the Redrow (and any other) application for housing at St. Nicholas.

Yours faithfully,

Robert Davidson.

Payne, Adrienne J

From: Paul Williams [REDACTED]
Sent: 03 October 2016 21:46
To: Planning
Subject: For the attention of the VoG planning Committee meeting on 6 Oct 2016 - Application no 2015/00249/FUL
Attachments: 2016 10 03 - Letter for planning committee from Dr Paul Williams.docx

FAO Ms V L Robinson

Dear Ms Robinson

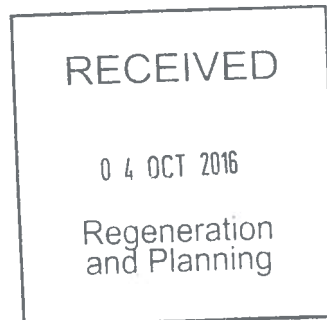
I attach a letter concerning the above planning application for development of land to the East of St Nicholas. It is due to be considered by the planning committee on 6 Oct 2016.

The powerful arguments against this proposed development previously submitted by me have not been mentioned by the planning Department in its Report.

I would thus be most grateful if you would circulate a copy of this letter to all members of the Planning Committee before the 6 Oct meeting so that they may consider these detailed objections, which the planning Department has neither mentioned nor sought to address.

Yours sincerely

Paul Williams

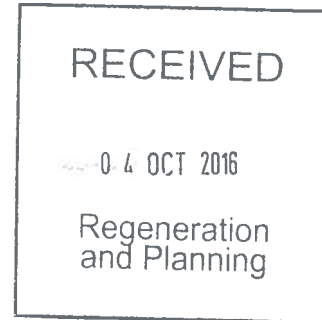


D.E.E.R
RECEIVED
ACTION BY: <i>AMM BOM SDB</i>
NO: <i>10</i>
ACK:

11 Ger-y-Ilan
St Nicholas
Vale of Glamorgan
CF5 6SY

03 October 2016

Ms VL Robinson
Operational Manager – Development Management
The Vale of Glamorgan Council
Dock Office, Barry CF63 4RT



Dear Ms Robinson

**Planning Application by Redrow Homes: Land to the East of St Nicholas: LDP Site MG2 [43]
11 March 2016: Amended proposal to build 100 houses Your ref: 2015/00249/FUL/SR2**

I am writing in response to your letter of 12 September 2016 and the report on the above proposed development that has been submitted to the planning committee for consideration at its meeting on 6 October 2016. I have submitted many detailed letters objecting to the above proposal, whose arguments show clearly why this planning should not be granted. The report that has been submitted to the planning committee ignores or dismisses all of these issues without any justification. These arguments are made on factual grounds: the Welsh Government's own evidence indicates that there is no need for the above proposed development.

The following is a summary of the objections that I have presented to the Vale of Glamorgan planning Department but I would be most grateful if copies of this letter could be circulated as a late missive to all members of the planning committee before its meeting on 6 October 2016, given the failure by the planning department to mention these strong arguments of objection:

- 1 This application is out of order** The Deposit Local Development Plan (LDP) is currently being processed by the Vale of Glamorgan Council (VOGC). I have previously registered my objections to this, as have numerous other residents of St Nicholas, on the basis of a large number of errors and wrong conclusions made by the authors of the LDP. These objections and the consideration that should be given to them are currently subject to the required due process. The land to the east of St Nicholas that is the subject of this planning application forms part of the allocated site number MG2-43 which should be deleted from the LDP on numerous grounds as set forth in my objections to the LDP. For the planning officers of the VOGC to give permission for this planning application to go ahead would make a mockery of the planning process in that the constitutional objections would be ignored before the Inspector has issued his verdict on the LDP. This application is totally out of order by virtue of being lodged during a period when consideration of the LDP is still ongoing. **To grant permission for this application to go ahead would constitute an abuse of the planning procedure that would indicate to any party with a vested interest in future how to overthrow the judgement and undermine the professionalism of planning officers, by subverting the very planning process itself.** The VOGC has already confirmed that it currently has no shortfall in the 5-year supply of land for housing, such that there is no justification to consider this application at this time, before the formal adoption of the LDP after the Inspector's report. **The application is premature and should not be considered as the site forms part of MG2-43 which should be deleted from the LDP, as suggested by many persons, whose objections are constitutionally under consideration at present. This should disallow this application from being considered further, as allowing it to proceed would**

willfully consign constitutional objections to dismissal by planning officers or the VOGC, rather than by the Inspector.

2 The proposals in this application are contrary to or in breach of the policies in the most recent Unitary Development Plan (UDP). With reference to the current documents referred to by the LDP:

A. The document 01 - Deposit plan written statement November 2013 states on pages 25 & 26 under 'Vision and Objectives' that objective 4 is to protect and enhance the Vale of Glamorgan's historic, built, and natural environment. Objective 10 is 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. **This planning application is not consistent with either of these objectives. The proposed site is currently prime agricultural land in open countryside. This is graded as grade 2 land, not grade 3A as Redrow claim it to be. It is not an in-fill area of land. The village of St Nicholas would be completely distorted by such a massive development. This would represent a major incursion of building into open countryside. This planning application would have a major detrimental impact on the existing character and local environment of the minor rural settlement of St Nicholas, which has grown organically over many centuries. This planning application completely contravenes objective 4. Such objections to development on this scale have already been pointed out to the VOGC by the Welsh government in its response to the initial LDP.**

as well as allocations

B. The document 01 - Deposit plan written statement November 2013 states on pages 55 – 59 under 'Policy MG1 – Housing supply in the Vale of Glamorgan that there is a housing land requirement of 9,950 new dwellings during the plan period. It goes on to say, *inter alia*, that this will be met through the use of small sites including infill and with priority given to brown field and committed sites. **The land to the East of St Nicholas is neither in-fill nor brown field site and so these proposals do not comply with policy MG1.**

C. The document 01 - Deposit plan written statement November 2013 states on page 94 under 'Policy MD1 – Location of new development that 'development will be favoured where it has no unacceptable impact on the countryside. The planning application by Redrow has a major impact on the countryside. **The proposals to develop the land to the East of St Nicholas directly contravenes policy MD1.**

D. The document 01 - Deposit plan written statement November 2013 states on pages 95–97 under 'Policy MD2 – Place making that proposals should ' Respond appropriately to the local context and character of neighborhood buildings in terms of type, form, scale, mix and density. This planning application is for 101 houses on 3.65 hectares of land, a density of 27.7 houses per hectare. This grossly exceeds the adjacent Conservation Area which has a density of less than 6 houses per hectare. **This is an urban degree of density that is completely out of context with the existing village and Conservation Area – one that would permanently ruin its character and amenity. This planning application directly contravenes policy MD2 (paragraphs 7.5 of the LDP and 4.5 of the Deposit LDP).** It is wrongly claimed at paragraph 2 of the Planning Statement that there is no planning history for the Site. Two planning applications for house construction on part of the Site were refused by VOGC on 10 January 1989 for the construction of 10 houses and on 22 May 1991 for the construction of 6 houses (ref 1988/01152/OUT). **The grounds for refusing permission for the construction of 6 or 10 houses apply even more to the proposed construction of 100 houses.**

In its representations to VOGC on the LDP, the Welsh Assembly Government stated that 'Allocations in some minor rural settlements, for example, 100 units at St Nicholas and 120 units at Bonvilston appear disproportionate to current services and facilities.' (paragraph B.1(d) of the Annex to the letter of 20 December 2013, VOGC reference P/POL/AMW/LDP3). The scale of developed in this application is wholly disproportionate to the size of the current village.

- E. The document **01 - Deposit plan written statement November 2013** states on page 102 under 'Policy MD6 – Development within minor rural settlements that new developments in minor rural settlements will be permitted where 'the proposal would not represent a visual intrusion into countryside or the loss of important open spaces that contribute to local amenity, character or distinctiveness'. **This planning application constitutes a de facto visual intrusion into countryside, and the distinct character and amenity of the rural view of St Nicholas after emerging from the urban environments of Cardiff and Culverhouse Cross. Proposals to develop the land to the East of St Nicholas thus directly contravene policy MD6.**
- F. The document **01 - Deposit plan written statement November 2013** states on page 106 under 'Policy MD9 – Historic Environment that development proposals must protect the qualities of the built and historic environment of the Vale of Glamorgan, specifically within Conservation Areas, development proposals must preserve or enhance the character or appearance of the area. **The area of land to the East of St Nicholas borders the Conservation envelope of the village, and was not included in the UDP as land for development. This planning application is the contrary to the UDP. It neither preserves nor enhances the character or the appearance of the area, and so directly contravenes policy MD9.**
- G. The document **10 – LDP Affordable Housing Background paper** shows on Table 2, page 5 the distribution of Affordable Housing Requirement in the Vale:

a. Sub Area				Need Requirement	
	1. Need	Supply	Total	% of net shortfall	Supply (% of need)
b. Barry	1,018	466	552	59.9%	45.8%
c. Penarth	236	109	153	16.6%	41.6%
d. Rural	45	10	35	3.8%	22.3%
e. East Vale	-3	4	-7	0	-
f. Coastal 236	54	182	19.7%		22.9%
g. Total	1,558	643	915	100%	41.3%

The (**emboldened row in the**) Table shows (and paragraph 3.7 above it in document 10 states) that there is no shortage of affordable housing identified in the Eastern Vale. **Proposals to develop the land to the East of St Nicholas thus cannot be justified by a putative need for affordable housing, for no such housing is required in the Eastern Vale. The lack of local services such as a shop, post office, public house, doctor's surgery etc and infrequent bus services make the construction of affordable housing at this site even more illogical.**

old data?

- H. The document **11 – LDP Affordable Housing Viability Study** shows on Table 3.3 and 3.4 on page 21-22 the cost of residential and industrial land values regionally.

Table 3.3 Residential land values regionally

WALES			
REGION	Small Sites (sites for less than five houses)	Bulk Land (sites in excess of two hectares)	Sites for flats or maisonettes
	£s per hectare	£s per hectare	£s per hectare
Cardiff	2,750,000	2,750,000	2,600,000
Carmarthen	900,000	900,000	850,000
Merthyr Tydfil	1,100,000	1,000,000	1,000,000
Bridgend	1,550,000	1,550,000	1,550,000
Swansea	1,400,000	1,400,000	1,800,000
Llandudno	1,000,000	850,000	1,000,000
Newport	1,900,000	1,900,000	1,400,000
Wrexham	1,000,000	850,000	1,000,000

Table 3.4 Industrial land values in Wales

WALES			
	From £s per ha	To £s per ha	Typical £s per ha
Cardiff	210,000	315,000	270,000
Carmarthen	160,000	210,000	190,000
Merthyr Tydfil	135,000	200,000	160,000
Taff Ely	125,000	205,000	140,000
Swansea	190,000	245,000	235,000
Colwyn Bay/Llandudno	200,000	300,000	250,000
Newport	180,000	250,000	225,000
Deeside	200,000	300,000	250,000

They show that the cost of Industrial land is about 1/6th to 1/10th that of residential land. The cost of the plot of land upon which a house is built is for most houses the major part of the cost. Thus houses will be much cheaper if built on industrial land. This proportional better value (more sq ft of living space per £ spent) will apply particularly to affordable housing. Thus the economics argues strongly in favour of not developing prime-land sites such as the land to the East of St Nicholas, but developing sites in the Vale such as Llandow Trading estate. Any housing need in the Vale of Glamorgan could be provided on brownfield land such as Llandow or land of lower agricultural grade. The proposed site allocation on grade 2 (or 3A) agricultural land **conflicts with paragraph 4.10.1 of July 2014 'Planning policy for Wales'**.

- I. The document 20 – LDP findings of the Site Assessment Background paper shows on Table 5 (page 47), which shows the sustainability scores for allocated sites, that the site for which planning permission is sought scores a ' - ' on 'To use land effectively and efficiently', 'To protect and enhance the built environment and natural environment' and 'To reduce the need to travel and enable the use of more sustainable modes of transport'. **Proposals to develop the land to the East of St Nicholas by the VOGC's own assessment thus represents failure in these major conservation and green objectives.**
- J. The document 21 – LDP Green Wedge Background paper states on page 9 that each of the existing green wedges and any proposals for new green wedges are assessed against the following objectives:
 - a. To prevent urban coalescence between and within settlements;
 - b. To ensure that development does not prejudice the open nature of the land;
 - c. To protect undeveloped land from speculative development and
 - d. To maintain the setting of built up areas

The land for which planning permission is sought should become part of the green wedge to prevent the coalescence of Culverhouse/Cardiff and the Eastern Vale by extending the existing green wedge that lies north of Wenvoe westwards. We should be increasingly protecting and extending such green wedge areas rather than developing those agricultural areas that adjoin existing green wedges. **Proposals to develop the land to the East of St Nicholas make such coalescence between Culverhouse Cross and the Eastern Vale at some stage in the future more likely.**

- K. The document 31 – LDP Population & Housing Projections Background paper shows in Table 1 (page 10) the main components of population change used in the Welsh Government 2006-2030 based predictions for the Vale of Glamorgan. The no of births per year exceed the no of deaths by between 2 and 250 per year. However there is net migration of population into the Vale of Glamorgan of 815 per year. **It is this projected inward migration of 815 per year that creates the bulk of the projected housing demand.**

Table 10 (page 23) shows the main components of population change used in the Welsh Government 2008-2032 based predictions for the Vale of Glamorgan. The no of births per year exceed the no of deaths by between 44 and 350 per year. However there is net migration of population in to the Vale of Glamorgan is now significantly lower than the 2006 estimate, at 547 per year. **Thus in the 2 years from 2006 to 2008, the projected inward migration has been reassessed and reduced from 815 to 547 per year.**

Table 29 (page 42) shows the main components of population change used in the Welsh Government 2011-2036 based predictions for the Vale of Glamorgan. The no of births per year exceed the no of deaths by between 241 and -209 per year. However there is net migration of population in to the Vale of Glamorgan is now again significantly lower than previous estimates at 217 per year. **Thus in the years 2006 to 2008 to 2011, the projected inward migration has been reassessed and downsized from 815 to 547 to 217 per year.**

In view of this level of downsizing of estimates, and likely continuing very slow economic growth for many years ahead due to global economic reasons (the continuing rise of China, India, SE Asia) and domestic ones (National debt, Brexit and weak economic performance) we are very unlikely of requiring levels of extra housing in the Vale of Glamorgan beyond those already achieved operative for the next 5 years. **This planning application is for the building of houses for which there is no current need. Any justification for permitting this development on the basis of housing need flies in the face of the Welsh Government's own projections.**

- 3 **This proposed development would have major consequences on A48 traffic.** St Nicholas does not have many essential facilities such as a shop, post office, doctor's surgery, public house etc and as a consequence any housing development would entail frequent short car journeys by residents, given the very limited public transport facilities. **This is contrary to Objective 3 and to the objective expressed in paragraph 7.12 of the LDP.** The centre of the village is frequently packed with parked cars, particularly at school times and this already presents great danger to children and adults. The roads are very narrow and lack pavements - indeed it is frequent that cars have to reverse in order to pass in opposite directions. The exits from the north side of the village on to the A48 are blind and difficult to negotiate. Joining the A48, particularly when turning to the West is difficult at the best of times and extremely difficult during the prolonged morning and evening rush hours. The proposed

development of 101 houses would the ingress and egress of up to 200 cars daily. These would present a very significant hazard to the voluminous traffic traversing St Nicholas, especially for cars turning to the right either onto the A48 or exiting the A48. The capacity of the A48 has been calculated wrongly by estimating it at the points between Cowbridge and Culverhouse cross that have a (deregulated) 60 mph speed limit. The traffic flow slows considerably through St Nicholas (which has a 30 mph speed limit). The A48 is already at overcapacity through St Nicholas. **I object to this planning application as the addition of a substantial number of cars entering and leaving the A48 at St Nicholas would cause substantial further disruption, delay and possible danger in a situation that is already very close to gridlock.**

- 4 **Delay by the VOGC in responding to the Welsh Government** The Welsh Government's response to the VOGC Revised deposit LDP in their letter of 20 December 2013 (refs: QA980858 & P/POL/AMW/LDP3) states that:

The current consultation on the Draft Planning Bill makes reference to end dates of development plans, after which it is proposed they no longer remain extant. This would apply to the Vale of Glamorgan's Unitary Development Plan (UDP) which expired in 2011. This could result in the authority having no extant development plan in place to make decisions before adoption of the LDP. It is therefore imperative that LDP preparation moves forward as swiftly as possible incurring no further delay. We would wish to avoid a situation where your local authority is in a vulnerable position for an extended period of time. The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. I have considered the Deposit LDP in accordance with the consistency/coherence tests, and principally in accordance with whether satisfactory regard has been given to national planning policy (test C2). **The Welsh Government's representations are separated into 4 categories which are supported with more detail in the attached annex.**

The annex states:

d) Spatial Strategy -Policy MG 2

It is unclear how the role and function of settlements has been reflected with regard to the scale of housing proposed. While the scoring matrix focuses on 'functional links' (Sustainable Settlements Appraisal 2013) the services and facilities in many of the minor rural villages themselves appear poor. Allocations in some minor rural settlements, for example, 100 units at St Nicholas and 120 units at Bonvilston appear disproportionate to current services and facilities. The proposed level of housing provision has increased in totality within Minor Rural Villages from 787 units in the first Deposit Plan to 946 units. Further clarification is needed to explain whether provision matches need in the appropriate locations and how the proposed allocations align with the objectives of the plan. For example, scale of growth and commuting patterns.

We consider that the proposed spatial distribution could potentially encourage reliance on the car and compound infrastructure problems in rural locations. **While it is acknowledged that one of the aims of the plan is to support facilities in minor rural villages, it is not clear that the rationale for allocating over 940 units in such areas has been fully evidenced.** The level of housing provision in Barry has reduced significantly from 3052 units from the previous Deposit Plan to 2360 units. **The current spatial distribution is potentially in conflict with Key Objectives 2 and 3 of the LDP. It may be necessary to allocate additional housing sites in the Key and Service Centre Settlements.**

The Welsh Government is clearly opposed to developments on this sort of scale and urges the VOGC to deal expeditiously with the stalled LDP, urging (my bold italics) that:

It is therefore *imperative* that LDP preparation moves forward *as swiftly as possible incurring no further delay*. We would wish to avoid a situation where your local authority is in a vulnerable position for an extended period of time. *The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine.*

Approval of this application in advance of the completion of due process on the LDP would make nonsense of all the work of members of the public in participating in the statutory consultation and representation at the Inspector's hearings. Their representations should and must be properly considered by VOGC and the Inspector before any application relating to MG2 43 is approved by VOGC. I object to this planning application as permitting it would act in contempt of the due process that is currently in operation by subverting the Inspector's role, position and influence.

At packed public meetings in St Nicholas on 19 March 2012 & 2 December 2013, plans to allocate land to the East of St Nicholas for housing development were unanimously opposed, and on 22 March 2015 there was unanimous opposition at a packed public meeting to the original planning application for 79 houses. This opposition applies equally or more to the current application for 100 houses.

This planning application conflicts with many policies as indicated above and has multiple basic flaws. It is out of order and in breach of UDP policies. This planning application cannot rely on inclusion of the site as part of MG 2 [43] until my objections and those of others to the site's inclusion in the LDP have been properly considered by the VOGC and the Inspector prior to adoption of a revised LDP, as is the clear wish of the Welsh Government.

The above objections are made on objective criteria and constitute very strong arguments for refusal of this planning application. I thus request that the Council should refuse planning permission for this application and any other that may relate to all or part of MG 2 [43] until the formal adoption of the revised LDP following the Planning Inspector's decision on the soundness of the revised LDP.

As previously requested, I would be most grateful if copies of this letter could be circulated as a late missive to all members of the planning committee before its meeting on 6 October 2016, given the failure by the planning department to mention these strong arguments of objection.

Yours sincerely

Dr Paul Williams

Payne, Adrienne J

From: Tim Knowles [REDACTED]
Sent: 03 October 2016 20:18
To: Planning
Subject: Planning Committee - 6 October 2016 - St Nicholas - Redrow Homes (South Wales) Limited - 2015/00249
Attachments: 161003 - letter for Planning Committee.pdf

For the attention of Ms V L Robinson

Dear Ms Robinson

I am attaching a copy of a letter dated today concerning the planning application number 2015/00249 by Redrow Homes (South Wales) Limited to build 100 houses at St Nicholas scheduled for consideration by the Planning Committee of the Council at the meeting on 6 October 2016.

Please circulate copies of this letter to all members of the Planning Committee in time for consideration in advance of the meeting.

Yours sincerely

Tim Knowles

RECEIVED
04 OCT 2016
Regeneration and Planning

D.E.E.R
RECEIVED
ACTION BY: <i>WRI [signature] SDB</i>
NO: <i>8</i>
ACK:

CAE FFYNNON 12 GER-y-LLAN, St NICHOLAS, CARDIFF, CF5 6SY
Telephone: [REDACTED] E-mail: [REDACTED]

COPY BY E-MAIL - [REDACTED]

Your ref.: 2015/00249/FUL/SR2

3 October 2016

Ms V L Robinson
Operational Manager - Development Management
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

RECEIVED

04 OCT 2016

Regeneration
and Planning

Dear Ms Robinson

Planning Application by Redrow Homes (South Wales) Limited - Land to the East of St Nicholas ("the Application")

I refer to your letter dated 12 September 2016 and the Report on the above proposed development submitted to the Planning Committee ("the Committee") for consideration at the meeting of the Committee to be held on 6 October 2016 ("the Report").

The letter dated 12 September 2016 gave 21 days for representations, thus allowing such representations to be made up to 3 October 2016. The issue of the Report in advance of that date implies that any representations, however pertinent, would be ignored in making recommendations to the Committee.

The Report presents the case in support of the recommendation of the Planning Department ("the Department") for approval of the Application. It is a one-sided Report which makes no realistic attempt to describe the numerous strong objections, many with detailed arguments, submitted by local residents objecting to the Application. It is noteworthy that there were over 190 objections (page 36), most from residents of the 141 existing properties in the village. This demonstrates the strength of the local opposition to the Application.

I have submitted seven letters at various stages in the consideration of the Application by the Department as new and changed proposals emerged. Each letter set out detailed arguments against the Application but most of these issues have been ignored or brushed aside in the Report. No attempt has been made to justify the apparent view of the Department that the issues described were incorrect or irrelevant. The failure to deal properly in the Report with the objections made by me and many other local residents clearly demonstrates that the Department had determined by the time of issue of the Deposit Local Development Plan ("the LDP") in November 2013 that 100 houses would be built in St Nicholas and from that point onwards the Department had no intention of being confused by the facts.

Out of over 190 objections received by the Department, only three letters have been reproduced in Appendix C of the Report. These letters do not demonstrate to the Committee the extent and nature of the many powerful objections to the Application. The first and third letters clearly indicated that they were supplementary to earlier more detailed objections which have not been reproduced in the Report. The second letter merely summarises a few issues from an enclosed detailed report by a planning consultant which has not been reproduced.

The following is a brief summary of some of the issues raised by me in my seven letters and not dealt with adequately in the Report:

1. Prematurity. The consideration of the LDP by the Inspector appointed by the Welsh Government is at an advanced stage. The Inspector is expected to report in early 2017 (page 44). The proposed development at St Nicholas featured prominently in the Public Hearing Sessions in early 2016. Many detailed objections were raised to the inclusion of the St Nicholas development in the LDP and some of the contents and conclusions of the supporting documents issued by the Council were challenged in written representations and at the Public Hearings. As a result, the Inspector issued a number of Action Points specifically related to St Nicholas. The Council has responded to these Action Points but the six weeks Consultation Period on Matters Arising Changes did not commence until 26 September 2016. There are strong grounds for believing that the Inspector will not approve the inclusion in the Adopted LDP of a development of 117 houses at St Nicholas. Consequently, consideration of the Application by the Committee should not be based on a presumption that the proposed development at St Nicholas will be included in the Adopted LDP. Any approval of the Application at this late stage in the LDP process in the light of the many powerful objections is premature, undemocratic and makes the LDP process a very expensive and time consuming farce.
2. Disproportionate. The proposed development of 117 houses (including 17 by Waterstone Homes Limited) in a village of 141 houses (most of which are in a Conservation Area) represents an increase of 83%. When the LDP allocated 100 houses to St Nicholas, the Welsh Government in its representation on the LDP stated "Allocations in some minor rural settlements, for example 100 units in St Nicholas and 120 units at Bonvilston, appear disproportionate to current services and facilities." While apparently ignoring this representation, the Department has subsequently increased the allocation at St Nicholas to 117 houses. The proposed development is wholly disproportionate to the size of the existing village.
3. Out of character with the existing minor rural settlement. St Nicholas has grown organically over many centuries. The village is spread out with most houses in substantial plots on both sides of the A48 which runs through the centre of the village. Residents have chosen to live in a rural environment away from urban development. The Report (page 49) claims that the overall density of St Nicholas is approximately 10 dwellings per hectare. This figure is disputed. Evidence with a supporting map was submitted to the Department on 10 December 2013 in a representation on the LDP demonstrating that the density is approximately 4.4 houses per hectare. The density of Ger-y-Llan is approximately 9.3 houses per hectare.

The Report cites higher densities in Church Row and Smiths Row as justification for a density of over 25 houses per hectare in the proposed development. Church Row comprises 4 dwellings and Smiths Row comprises 5 dwellings. These small groups of houses cannot be compared with or used to justify a relatively huge development of 100 houses (or 117 houses including the proposed Waterstone development). Furthermore, Smiths Row comprises mainly old thatched cottages, very different in character from the proposed development. A development on the scale proposed would irreversibly destroy the nature and character of the ancient rural village.

4. Services and facilities. St Nicholas has no shop, public house, restaurant, post office, doctor's surgery, leisure centre or library. There are only minimal employment opportunities in the village. Thus, the residents of the proposed development would be obliged to make short car journeys or expensive bus trips for almost all of their daily needs. The nearest shops are at Culverhouse Cross which is 1.6 miles from the entrance to the site and significantly further from the northern part. It is unrealistic to expect residents to walk or cycle to the shops and other facilities with the return journey up the long steep hill known as The Tumble. The need for short car trips conflicts with Objective 3 and paragraph 7.12 of the LDP.
5. Affordable housing. The need for affordable housing in the Vale of Glamorgan is not disputed. However, statistics produced by the Council have demonstrated that there is either no net need or, at most, minimal need in St Nicholas. The main areas of need for affordable housing are in the primary settlements of Barry, Llantwit Major and Penarth. The Application provides for 35 affordable or intermediate dwellings. Most if not all of these dwellings would inevitably be allocated to persons or families currently living outside St Nicholas and having no family connection with existing residents of St Nicholas. The new residents would be isolated from their current communities and families. They would need to make frequent car or bus journeys to maintain their links with those communities and families. There is no direct bus service to the primary settlements so bus journeys would be long and difficult.

The Department has sought to justify the allocation of affordable houses to St Nicholas by reference to an alleged demand in Wenvoe and Peterston-super-Ely. Wenvoe is in the same political Ward as St Nicholas but has no connection with St Nicholas, is over three miles away by road and has adequate provision for affordable houses in developments currently under construction at the ITV site and to the immediate south of Wenvoe. Peterston-super-Ely is over three miles away by road, most of which is through narrow country lanes which already have more traffic than can be reasonably accommodated. To the extent that there is any demand for affordable houses in Peterston-super-Ely, it would be more than adequately provided by the proposed development at Bonvilston which is closer by road.

6. Village road capacity. The centre of the village (north of the A48) is often heavily congested with parked vehicles, particularly in the roads around the church immediately before the weekday opening and closure of the school. Similar congestion occurs when there is a wedding or funeral at the church. The roads on the north side of St Nicholas are wholly unsuitable for any of the additional traffic which would be generated by the proposed development. There is no pavement on the roads around the church. It is particularly unsuitable and dangerous for young children and any disabled person on School Lane to the north and east of the church. There is no room for a wheelchair on the road to the north where vehicles are usually parked leaving barely enough room for other vehicles to squeeze through.

Any vehicle travelling in either direction along School Lane has to negotiate a blind bend at the junction with Well Lane in the north east corner of School Lane. This is particularly dangerous when vehicles are parked on the bend as is frequently the case. The exit from Ger-y-Llan is also blind and dangerous as vehicles travelling south on School Lane pick up speed.

7. Main access to site. The proposal to have two new access roads from the A48 within about 72 metres of each other is, to say the least, ludicrous. A single access would cause significant problems and dangers but two access roads would exacerbate those problems and dangers. While the proposal provides for a filter lane for traffic from Culverhouse Cross turning right into the site, the main problem and dangers arise from traffic leaving the site to turn right towards Cowbridge. Long experience of turning right out of School Lane onto the A48 demonstrates that it is very difficult at peak morning and afternoon periods to find gaps in traffic travelling in both directions along the A48. It is frequently necessary to wait for a motorist to give way in order to exit School Lane.

Traffic turning right when exiting the site will have to cross two lanes of traffic, the eastbound lane and the filter lane before joining through westbound traffic on the A48. The proposed access road is almost opposite the Old Police Station which is now used for business purposes and generates additional traffic movements.

The proposal also envisages the removal of an existing lay-by on the eastbound side of the A48. This lay-by is frequently used by service vehicles and visitors to nearby properties. Its removal will necessitate parking on the busy A48, causing additional hazards and dangers for traffic.

8. Pedestrian and cycle access. The status of the private drive which connects the site to Ger-y-Llan is described on page 54 of the Report. Although the private drive is outside the site which is the subject of the Application, the Application includes a gateway or bollards (the plan is unclear) at the entry to the site from the private drive and envisages the use of the private drive for pedestrian and cycle access to the site. Such use of the private drive by residents (including children) of 100 houses (117 including the proposed Waterstone development) will cause immense disturbance to the amenity of the occupiers of the three properties along the private drive as well as other residents of Ger-y-Llan.