

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

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04 OCT 2016
Regeneration and Planning

D.E.E.R
RECEIVED
ACTION BY: <i>WNR</i> <i>SPB</i> <i>SPB</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 - planning@valeofglamorgan.gov.uk

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

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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.

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.

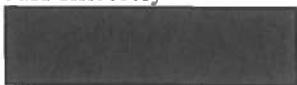
11. Education facilities. The arrangements for education facilities are described on pages 68 & 69 of the Report. The projected demands for 9 nursery, 25 primary and 23 secondary places appear to be substantial under-estimates for a development of 100 houses. There is no nursery in St Nicholas. The Report 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 black rectangular redaction box covering the signature of the sender.

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: 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

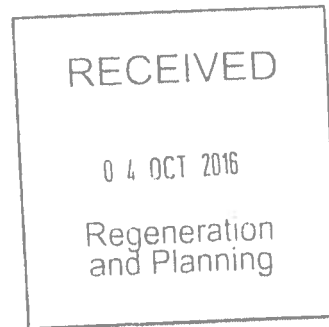
I attach a letter concerning the above planning application for development of land to the East of St Nicholas. It is due to be considered by the planning committee on 6 Oct 2016.

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

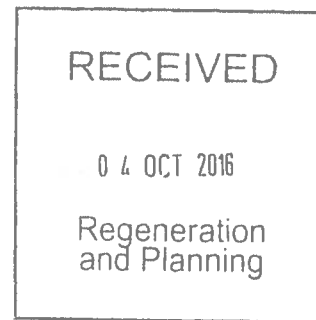


D.E.E.R
RECEIVED
ACTION BY: <i>AMM BMM SDB</i>
NO: 10
ACK:

11 Ger-y-llan
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.**
- 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.**

- 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: [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

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03 OCT 2016
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and Planning

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

To:> developmentcontrol@valeofglamorgan.gov.uk

From:> [REDACTED]

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.

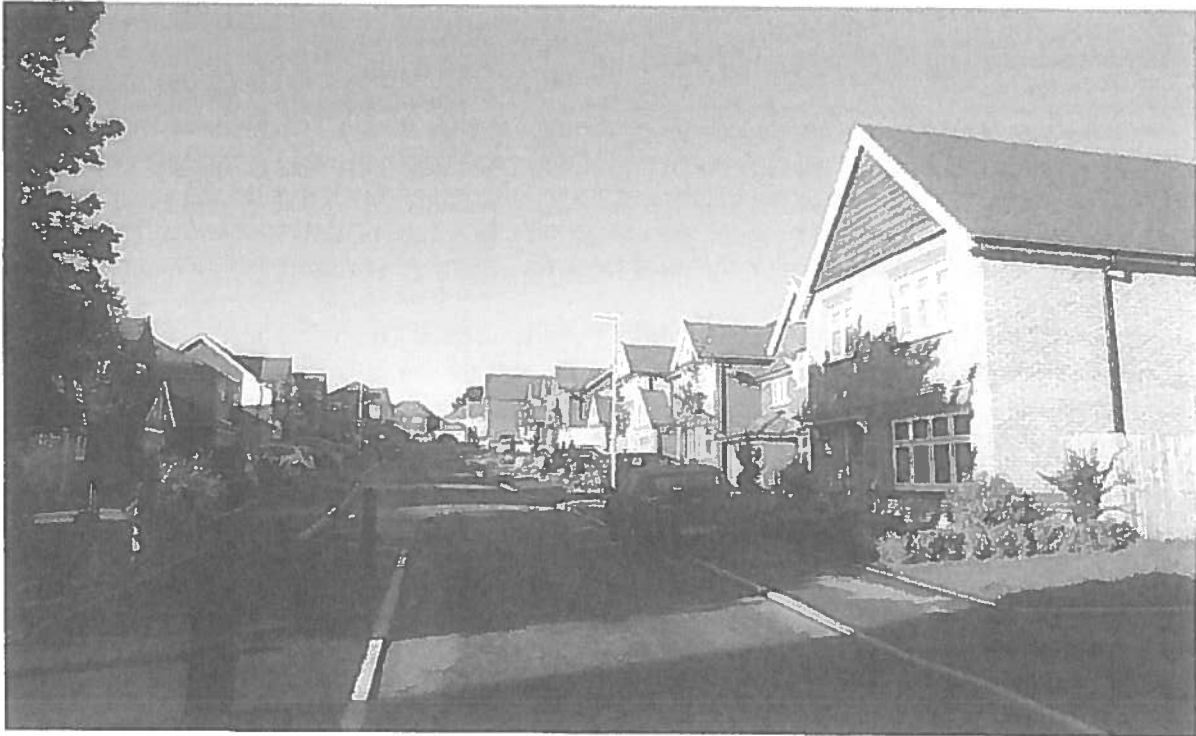
Continued:>>>

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16 OCT 2016

Regeneration
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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:->

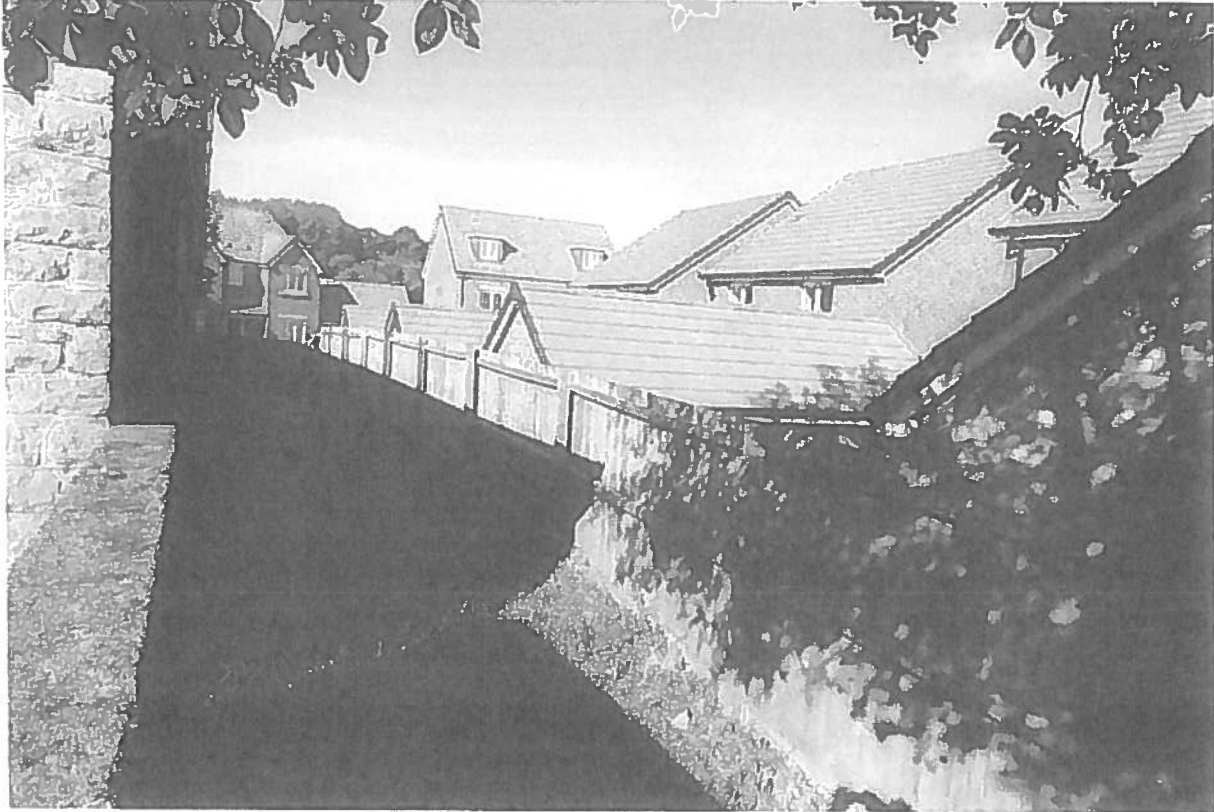


May I suggest the the Council require the house building companies to respect the local heritage of the Vale of Glamorgan. Fortunately, a local builder, JRS, has indeed done this with a development at Creigiau. Look at the two examples below which show the type of dwellings that I think would not look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

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03 OCT 2016
Regeneration
and Planning

J.E.E.R
RECEIVED
ACTION BY: *[Signature]* SDB
NO: 23
VTK:

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

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03 OCT 2016
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and Planning

D.E.E.R
RECEIVED
ACTION BY: <i>BRUNA SDB</i>
NO: 13
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;
- 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,

Dr John Macneil

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

D.E.E.R
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

Wayne, Adrienne J

From: Planning
25 September 2016 07:55
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 Ms mechelle collard [REDACTED]

Address: broadway green st nicholas ,cf5 6sr

Comments:
removing the bungalow 'Emmaville' would change the character of the village. The construction of 100 houses is completely unacceptable due to the extra traffic this would produce, the nearest supermarket although not a long distance away (approx 2 miles) is down a very steep hill. No One could carry their shopping back up the hill. herefore all 100 houses would need a car (or 2 cars). This will produce even more traffic coming through the village. At peak times eg 8am the traffic is backed up through onvilston to the 5 mile lane junction already, to add another 100 cars at least is irresponsible. There already large urbanisations in the Vale eg Barry and Cowbridge and ouses should be built in these towns first where there are the facilities to support new residents. With new houses at Culverhouse cross, Wenvoe and Colwinston already eing built it is difficult to understand why another 100 are needed in St Nicholas.

Case Officer:
Mr. Steven Rennie

D.E.E.R
RECEIVED
ACTION BY: <i>SE211R</i>
NO: <i>14</i>
ACK:

Payne, Adrienne J

From: Planning
Sent: 25 September 2016 15:08
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 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

RECEIVED
26 SEP 2016
Regeneration
and Planning

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

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>[Signature]</i> SDB
NO: 2
ACK:

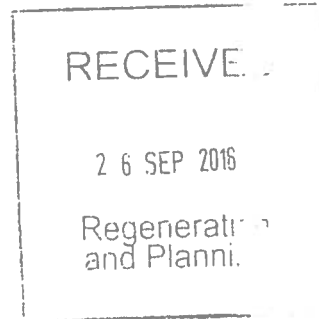
Payne, Adrienne J

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: 01446 704653
mob / sym:
e-mail / e-bost: srennie@valeofglamorgan.gov.uk



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

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

[Find us on Facebook / Cewch ddod o hyd i ni ar Facebook](#)
[Follow us on Twitter / Dilynwch ni ar Twitter](#)

D.E
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 [mailto:████████████████████]
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://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-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.

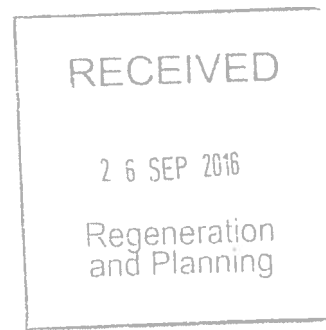
Yours sincerely

Dr Paul Williams

11 Ger-y-lan
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.

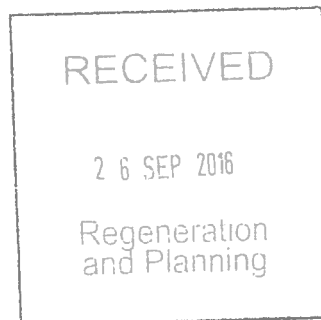
Yours sincerely

Dr Paul Williams

11 Ger-y-llan
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-llan (the road past Nos 11, 12 and 14 Ger-y-llan) 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-llan 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-llan 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-llan. 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.

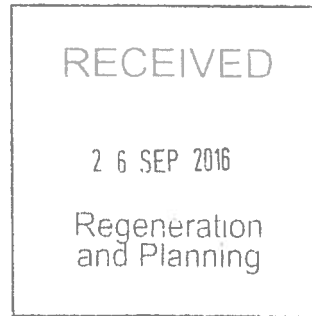
Yours sincerely

Dr Paul Williams

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://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-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: 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]

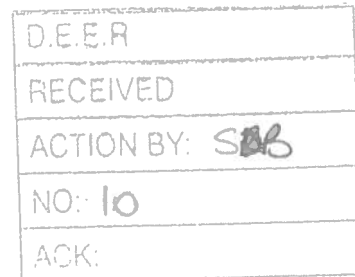
Address:
Village Farmhouse, St. Nicholas, Cardiff, CF5 6SG

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

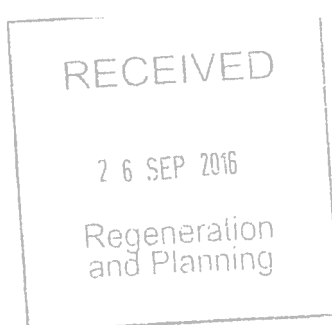
Yours Faithfully
Cliff Lewis
Sandra Lewis

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

Case Officer:
Mr. Steven Rennie



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