



**Geraint John Planning**

## **OUTLINE PLANNING APPLICATION**

**LAND OFF COWBRIDGE ROAD  
EGLWYS BREWIS  
ST ATHAN**

**RESIDENTIAL DEVELOPMENT OF CIRCA 300 UNITS, AND  
ASSOCIATED WORKS INCLUDING THE PROVISION OF  
PUBLIC OPEN SPACE AND STRATEGIC ACCESS POINTS.**

**PLANNING STATEMENT**

**NOVEMBER 2016**

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## 1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of an Outline Planning Application, submitted on behalf of the Edenstone Homes Ltd and Mr John Thomas, for the following development proposals located at Land Off Cowbridge Road, Eglwys Brewis, St Athan:

*"Residential Development of circa 300 units, and associated works, including the provision of public open space and strategic access points"*

### **Purpose and Structure of this Statement**

- 1.2 This Planning Statement outlines the context within which this outline planning application is made, and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development. The statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surroundings;
  - **Section 3** provides details of the development proposals;
  - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
  - **Section 5** analyses the key planning considerations arising from the proposed development (in light of the planning policy context);
  - **Section 6** sets out our conclusions.

## 2.0 SITE AND SURROUNDINGS

### Site

- 2.1 The site is formed by three parcels of land that are located off Cowbridge Road, and adjoining the existing MOD St Athan base. The site is adjacent to and abuts the existing settlement, the north of St Athan. The site area totals to 10.9ha (approx.)



- 2.2 The site is comprised of two large parcels of land, both of which lie outside of the existing settlement boundary and are currently in agricultural use, and one smaller parcel which lies within the settlement boundary limits and is currently comprised of a tarmacked area, mown grass and landscaping.
- 2.3 The site is bounded by hedgerows along the northern, western and eastern site boundaries. Cowbridge Road / St Athan Road forms part of the south western boundary, while the south eastern site boundary is formed by the existing residential dwellings located on Clwyd Way, Celyn Close and Aled Way.
- 2.4 The site lies within the Local Planning Authority of The Vale of Glamorgan Council and has been allocated within the emerging LDP for 300 residential dwellings (site reference MG2 (5) – Land to the East of Eglwys Brewis, St Athan).

## **Surroundings**

- 2.5 The site is surrounded by a number of different land uses, which can be generalised as being of a residential nature to the south of the site, and open countryside to the north. More specifically, to the north of the site lies open countryside / agricultural land, followed by the cluster of developments which form Flemingston as well as Ty Newydd Farm. To the south of the site lies residential developments located off Flemingston Road, whilst further residential developments are located off St Athan Road to the west. To the south-east of the site lies the St Athan MOD airbase and to the west lies further residential developments located off St Athan Road.
- 2.6 The site is located approximately 200 metres from the bus stops located on Cowbridge Road, which is served by the 303 (running between Barry and Bridgend Town Centre), the 905 (Boverton) and the X91 (Cardiff and Llantwit Major) bus services.
- 2.7 Specifically, St Athan has the following services and facilities located within close proximity:
- A Church
  - 2 Convenience Stores (Premier Stores & Londis)
  - A Pharmacy
  - A primary school
  - Post Box
  - Bus services
  - 2 Leisure / Recreation facilities
  - Outdoor play area / equipment (located adjacent to the site)
- 2.8 The site is also located within close proximity to Eglwys Brewis (approx. 100m) and Llantwit Major (approx. 2 miles). Llantwit Major is identified as a Service Centre Settlement and has a significant number of services and facilities, including a train station, Primary and Secondary Schools, Church, sports clubs, a high street with shops, including a supermarket, coffee shop and pubs / bars.

## **Planning History**

- 2.9 A search of the planning history was conducted using the Vale of Glamorgan online search facility. According to the online database which is not necessarily exhaustive, the site itself has not been the subject to any historical / previous planning applications.
- 2.10 As aforementioned, the site has been allocated within the emerging LDP for 300 residential dwellings (site reference MG2 (5) – Land to the East of Eglwys Brewis, St Athan).

### 3.0 DEVELOPMENT PROPOSALS

- 3.1 This application seeks the approval of Outline Planning Permission for the following development proposal:

*"Residential Development of circa 300 units, and associated works, including the provision of public open space and strategic access points"*

- 3.2 The proposed development seeks to provide for circa 300 dwellings with associated public open spaces and car parking. It is proposed that the scheme will provide for a variety of dwelling types, from 1-5 bedroom units. The majority of the proposed dwellings will be two storeys in height, but there may be some elements of single and 3 storey accommodation. The proposal will also include affordable housing provision onsite.
- 3.3 Access to the development will be provided directly from Cowbridge Road. Three separate access points into the site will be provided, which will ensure that there is appropriate access provision.
- 3.4 The existing landscaping, trees and hedges, on the site boundaries, will be retained.
- 3.5 The existing public right of way / footpath will be retained through the site, in a slightly altered route. Although, the deviation from the existing route is not significant.

## 4.0 PLANNING POLICY CONTEXT

4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Statement.

4.2 The key planning policies of relevance to the determination of the application are outlined. A detailed assessment of the accordance of the proposed development with these policies is provided in Section 5 (Material Considerations) of this Statement.

### National Planning Policy

4.3 The following policy / guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of the application.

#### Planning Policy Wales (9<sup>th</sup> Edition, November 2016)

##### *Sustainability*

4.4 Sustainable development forms a key consideration central to all policies contained within Planning Policy Wales (PPW). Paragraph 4.4.3 of PPW sets out a series of objectives which development proposals should seek to achieve – those of key relevance to the application include the following:

- *Promote resource-efficient and climate change resilient settlement patterns that minimise land-take and urban sprawl, especially through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites;*
- *Locate developments so as to minimise the demand for travel, especially by private car;*
- *Ensure that all local communities – both urban and rural – have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate, in safe neighbourhoods*
- *Play an appropriate role to facilitate sustainable building standards that seek to minimise the sustainability and environmental impacts of buildings.*

##### *Housing*

4.5 It is highlighted in Paragraph 9.3.4 of PPW that *"In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity. Increases in density help to conserve land resources, and good design can overcome adverse effects, but where high densities are proposed the amenity of the scheme and surrounding property should be carefully considered"*.

4.6 Paragraphs 9.3.1 and 9.3.6 of PPW all relate to the provision of housing and the criteria and circumstances that justify the location of such proposed development. These policies provide for development in locations that are close to, and well related / integrated with, existing settlements and are sustainable.

##### *Good Design*

4.7 It is set out within PPW that *"meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales, from the construction or alteration of individual buildings to larger development*



*proposals*" (Paragraph 4.11.2). Further detail regarding the objectives of good design is set out within Technical Advice Note (TAN) 12: Design (2014). The Design and Access Statement which accompanies this application will contain a full assessment of the objectives set out in TAN12.

4.8 PPW advises in Paragraph 4.11.9 that *"the visual appearance of proposed development, its scale and its relationship to its surroundings and context are material planning considerations."* PPW goes on to advise that local planning authorities should reject poor design, however *"they should not attempt to impose a particular architectural taste or style arbitrarily."*

4.9 Development proposals should give consideration to addressing climate change, as set out within Paragraph 4.11.6 of PPW as follows: *"Good design should ensure that development contributes to tackling the causes of climate change (by reducing greenhouse gas emissions) and to effective adaptation to the consequences of climate change. An integrated and flexible approach to design, including location, density, layout and built form, will be an appropriate way of contributing to climate responsive development"*.

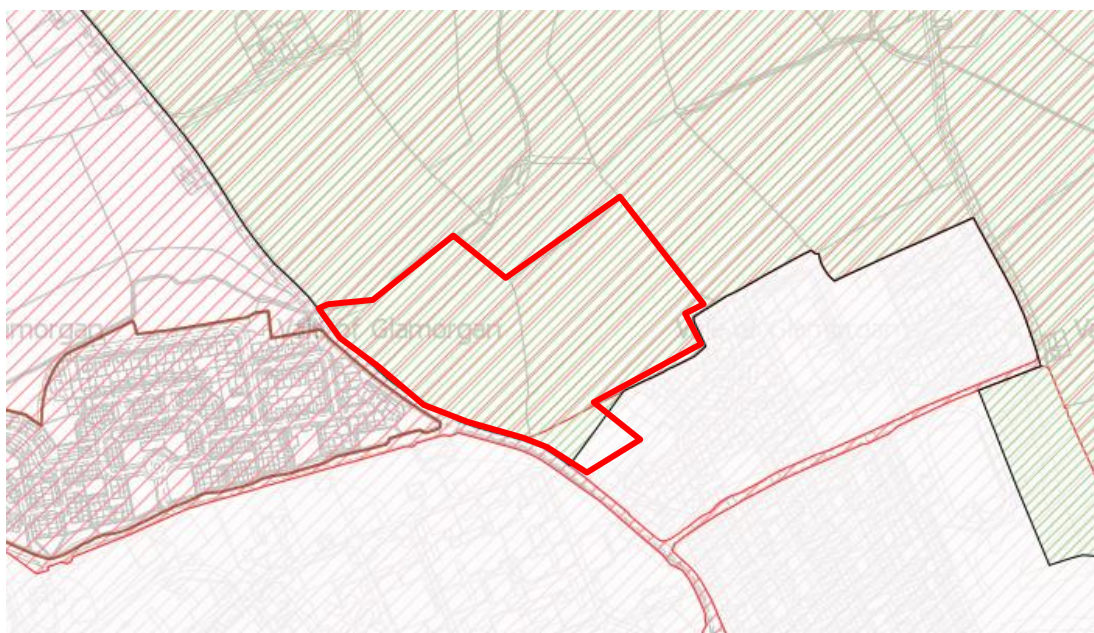
### Local Policy Context

4.10 The current (adopted) Development Plan for the area consists of the following:

- Vale of Glamorgan Adopted Unitary Development Plan (1996-2011).

4.11 In the context of the adopted UDP, the site can be summarised as having the following designations:

- A small parcel, located to the south of the site lies within the settlement boundaries.
- The majority of the site lies outside of the settlement limits and located within the countryside.
- The area of the site that is located outside of the settlement limits is located within a Special Landscape Area, the Lower Thaw Valley.



Extract from the UDP Proposals Map



4.12 The following policies are also considered relevant to the proposals:

- **Policy ENV 1** – Development in the Countryside: development in the countryside will be strictly controlled and must meet the criteria set out in this policy.
- **Policy ENV 24** – Conservation and enhancement of open space: Conservation and enhancement of open space which is important for amenity, recreation and/or nature conservation.
- **Policy ENV 27** – Design of New Developments: states that new development must have full regard to the context of the surrounding environment.
- **Policy ENV 29** – Protection of Environmental Quality: development will not be permitted if it would be liable to have an unacceptable effect on either people's health and safety or the environment.
- **Policy HOUS 8** – Residential Development Criteria: states that development (subject to HOUS 2) will be permitted which is within or closely related to the defined settlement boundaries, subject to criteria:
  - Scale, form and character is sympathetic;
  - Proposal has no unacceptable effect on amenity and character of the surrounding area;
  - Proposal does not have an unacceptable impact on good quality agricultural land, areas of attractive landscape, high quality townscape, areas of historical, archaeological or ecological importance;
  - When appropriate and feasibly the provisions of Policy REC 3 are met;
  - Car parking and amenity space is in accordance with Council guidelines; and
  - Adequate community and utility services exist / reasonably accessible.
- **Policy HOUS 11** – Residential Privacy and Space: Existing residential areas characterised by high standards of privacy and spaciousness will be protected.
- **Policy TRAN 10** – Parking: outlines what is expected of new development in terms of parking provision.

#### **Supplementary Planning Guidance**

4.13 The provisions of the following Supplementary Planning Guidance (SPG) have also been taken into consideration:

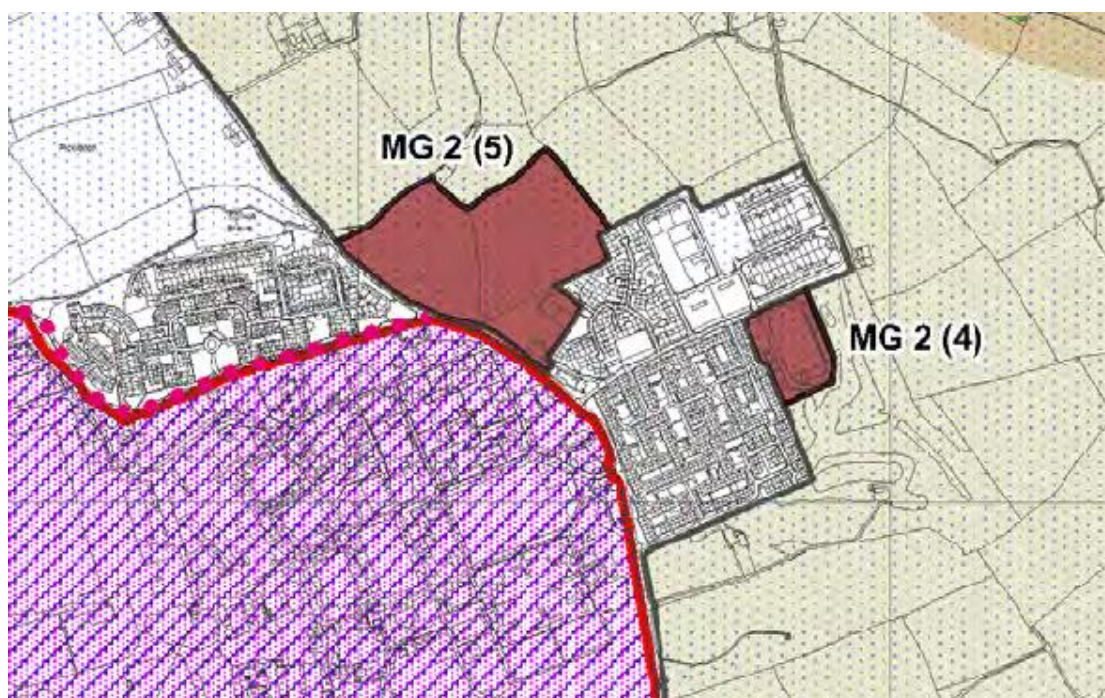
- Amenity Standards;
- Planning Obligations; and
- Sustainable Development – A Developer's Guide
- Parking Standards

#### **Emerging LDP Position**

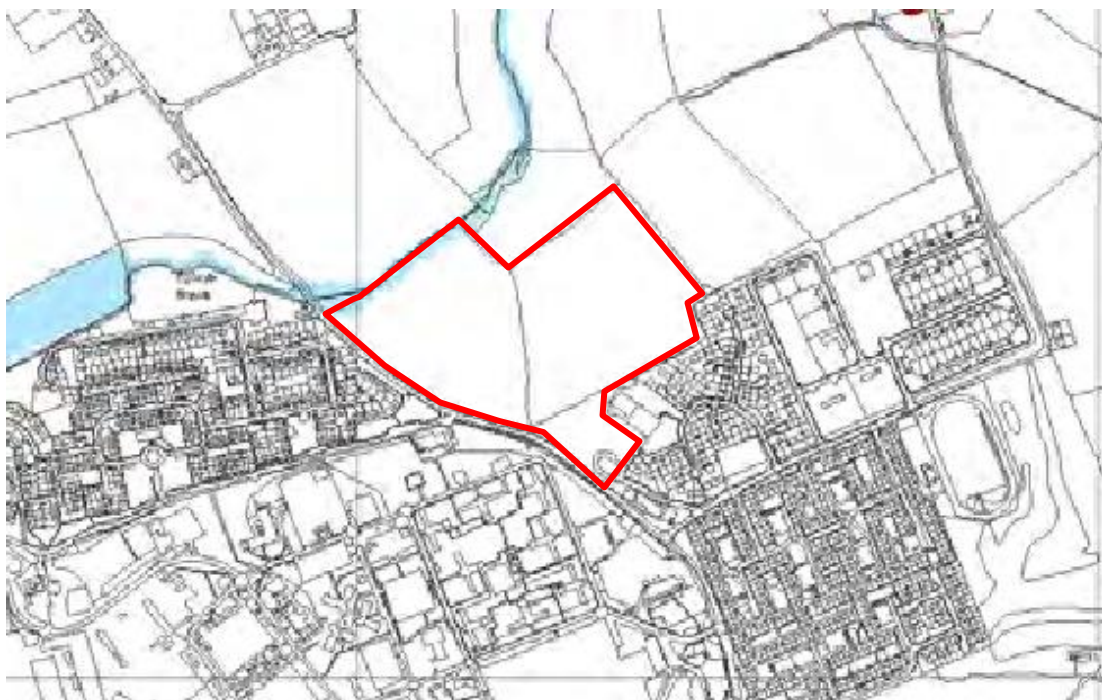
4.14 The Vale of Glamorgan Council is preparing a new Local Development Plan (LDP), which will set out how land within the Vale of Glamorgan is used between 2011 and 2026. The Vale of Glamorgan Deposit LDP 2011-2016 (November 2013) has been prepared, and the examination is currently ongoing, with the current timetable stating that the adoption of the plan is due at the end of 2016 / beginning of 2017. Therefore, the weight of the emerging plan increases as it progresses.

4.15 Under the emerging LDP, the key planning designations at the local level of relevance to the site and proposals are as follows (as indicated by the below extract from the UDP Proposals Map):

- Located within the settlement boundary, and no longer located within the countryside;
- Located outside of, but adjacent to the Special Landscape Area of the Lower Thaw Valley; and
- The site is allocated as a strategic housing site for 300 residential dwellings (site reference MG2 (5) – Land to the East of Eglwys Brewis, St Athan).



*Extract from the emerging LDP Proposals Map*



*Extract from the Emerging LDP Constraints Map*

- 4.16 The extract from the LDP constraints map confirms that the site is not subject to any constraints.
- 4.17 The key local planning policies of relevance to the consideration and determination of this application are outlined below. The compliance of the proposal with their provisions is set out and evaluated in Section 6 (Material Considerations) of this statement.
- **Policy MG2** – Housing Allocations: to meet housing requirements identified in policy SP 3, land is allocated for residential development in a number of locations, including Land to the East of Eglwys Brewis, St Athan (5), for 300 units.
  - **Policy MG4** – Affordable Housing: the provision of a minimum 30% affordable housing will be required on all residential developments where there is a net gain of 5 or more units in St Athan.
  - **Policy MD1** – Location of New Development: Location of new development will be favoured where it does a variety of things, including: supporting the delivery of affordable housing, where it does not unacceptably impact on the countryside, and does not unacceptably impact on sites of importance for nature conservation, special landscape areas or green wedges.
  - **Policy MD2** – Place Making: development will be favoured where it contributes to creating a high quality, sustainable place.
  - **Policy MD3** – Design of New development: sets out guidance for the design of new developments which should ideally be of a high standard and respond to local context and character.
  - **Policy MD4** – Community Infrastructure and Planning Obligations: where appropriate, the council will seek to secure new and improved community infrastructure, facilities and services appropriate to the scale type and location of

proposed developments through the use of planning obligations and / or the Community Infrastructure Levy.

- **Policy MD5** – Development in Key, Service Centre and Primary Settlements: New developments within these settlements will be permitted where they meet the following criteria;
  - Makes efficient use of land or buildings;
  - Would not prejudice the delivery of an allocated development site;
  - Is of a scale and form that is commensurate with the surrounding area and does not unacceptably impact upon the character and appearance of the locality;
  - Would not result in the unacceptable loss of public open space, community or tourism buildings or facilities;
  - Has no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking; and
  - Makes appropriate provision for community infrastructure to meet the needs of future occupiers
- **Policy MD7** – Housing Densities: Residential proposals within the key, service centre and primary settlements will be permitted where the net residential density is a minimum of 30 dwellings per hectare.
- **Policy MD8** – Environmental Protection: proposals are required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment.
- **Policy MD10** – Promoting Biodiversity: new residential development will be required, where possible, to positively contribute to biodiversity interests within the Vale of Glamorgan.

#### **Matters Arising Changes (MAC) Schedule Consultation of the LDP – September 2016**

- 4.18 The Council are undertaking a six-week consultation running from 16th September 2016 to 28th October 2016, where the Council are consulting upon a number of proposed changes to the emerging LDP that have emerged as a result of matters arising during the Examination Hearing sessions.
- 4.19 Of relevance to the proposed site are discussions had at, and resulting MAC changes stemming from discussions at Hearing Session 7, Housing Allocations (1) where this site was discussed.
- 4.20 One of the proposed MAC to the LDP is the Council's proposal to reduce the number of units allocated at this site, which recommends the reduction in numbers from 300 units to 255. Please see Appendix A to this statement which provides the key MAC changes of relevance to the site, and updated Appendix 5 to the emerging LDP, which provides individual site details for the proposed housing allocations. The proposed reduction owes to a potential ecological constraint on site (as the site is considered to host a rare arable weed) which the LPA consider restricts the net developable area.
- 4.21 The relevant extracts relating to the proposed site from the Council's Hearing Statement for Hearing Session 11 are enclosed at Appendix B. In regards to the ecological constraint on the site, this states the following:

*"Representations from NRW on the Deposit LDP identified that the site supports populations of rare arable weeds including the critically endangered corn buttercup (*Ranunculus arvensis*) and Shepherds Needle (*Scandix pecten-veneris*) which are critically endangered plant species in the UK. In response a Conservation Management Strategy has been prepared by the landowner (document SD69). This indicates an area of approximately 2 hectares is required to be undeveloped and managed to conserve the rare arable weed (area A1 illustrated in Figure 1, document SD69). This would reduce the net developable area to 8.5 hectares resulting in 255 dwellings being deliverable on the allocation, resulting in a density of 30 dwellings per hectare. It is proposed to amend the allocation to 255 dwellings in Policy MG2 to reflect this constraint."*

4.22 As such, the Council have proposed within the MAC consultation to reduce the number of units the site can accommodate from 300 to 255.

4.23 To support this planning application, a Preliminary Ecology Assessment of the site has been submitted. Despite NRW's comments stated above, the Terraqua report states:

*"No evidence was found within any of the three fields F1-F3 that critically endangered plant species formerly recorded within these areas such as shepherds needle and corn buttercup have survived the change in agricultural use from arable to grassland. The seed of both above species have relatively short survival periods. All three fields have been reverted to grass for a period of between two and four years. It is possible that a limited number of seeds have remained viable within the soil, however current management of the fields (permanent grassland) would suggest that the species are likely to be lost from these areas should current management continue"*

4.24 It is therefore considered that the site can accommodate up to 300 units as the rare arable weed is no longer apparent on site, and will be lost in the case of no development. Accordingly, there is no need to retain land within the site in this regard. There is therefore no requirement to reduce the developable area and the resulting unit numbers of the site as proposed by the MAC changes.

4.25 Further details in this regard, including proposed mitigation measures in regards to the arable sees, are set out within the Ecology sections provided later within the statement (see Chapter 5).

## 5.0 MATERIAL CONSIDERATIONS

5.1 The key planning considerations arising from the proposed development (in light of the planning policy context outlined within the preceding section of the Statement) are considered to be as follows:

- Principle of Development;
- Sustainability;
- Design;
- Highways;
- Ecology;
- Trees;
- Agricultural Land;
- Flood risk and Drainage;
- Archaeology; and
- Landscape and Visual Impact.

5.2 These issues are discussed in further detail below.

### Principle of Development

#### *Planning Policy Position*

5.3 As per the adopted UDP, the site lies outside of the settlement of St Athan and therefore lies within the Countryside, as designated within the adopted Vale of Glamorgan Unitary Development Plan. Notwithstanding this, the site lies adjacent to the settlement limits, and has existing built form along two of its boundaries. The site is therefore not an isolated parcel of land located within the countryside but adjoins the existing settlement of St Athan and is seen within the context of its existing built form.

5.4 It should also be noted however that this Plan covered the period up to 2011 and that the associated settlement boundaries were based on providing housing provision for that period.

5.5 National Policy by way of Planning Policy Wales (Edition 8, 2016) and Paragraph 2.8.4 states: *"It is for the decision-maker, in the first instance, to determine through monitoring and review of the development plan whether policies in an adopted LDP are outdated for the purposes of determining a planning application. Where this is the case, local planning authorities should give the plan decreasing weight in favour of other material considerations such as national planning policy, including the presumption in favour of sustainable development (see section 4.2)."*

5.6 As discussed above, the Council is currently preparing its LDP; St Athan has been identified as a Strategic Opportunity Area within the LDP and, more specifically the site is allocated for residential development under Policy MG 2. The site forms Housing Allocation 5 – Land to the east of Eglwys Brewis, St Athan, and is allocated for 300 units.

5.7 A number of recent planning applications for sites which are similarly allocated within the emerging LDP for housing development have, within the context of an expired UDP, received planning permission from the Council in advance of the adoption of the UDP. The Council has referred to the UDP as being "time Expired", meaning that policies should be given decreasing weight in favour of other material considerations, which justify a departure from the Development Plan.

5.8 In light of the above, it is considered that the Council should similarly view the UDP as being 'time expired' in this instance, and should give similar consideration to the determination of

this site. It is considered that this would be an appropriate and consistent stance to take, and the development proposals should be considered in this context.

- 5.9 For these reasons it is considered that the proposals should to be considered on their individual merit, having regard to other material considerations (reported later in this Statement), and particularly having regards to the quantified housing land supply shortage and the site's allocation in the emerging LDP – factors which ought to be given significant weight in the determination of the application.

*LDP Allocation*

- 5.10 As discussed above, the Land to the east of Eglwys Brewis, St Athan is allocated within the Deposit Local Development Plan under Policy MG 2 (5). In order to justify the allocation of the site the Council has carried out detailed assessment of its suitability and its sustainability credentials in two deposit LDPs. This was undertaken via an adopted site assessment methodology which assessed all of the allocated sites against a number of planning, environmental, physical and deliverability criteria. To determine how sites performed against sustainability objectives of the Vale of Glamorgan LDP – Sustainability Appraisal Framework, the Council undertook a three stage assessment process which included:
- Stage 1- Spatial Strategy Fit;
  - Stage 2- Environmental and Physical Constraints; and
  - Stage 3- Sustainability Appraisal.
- 5.11 The LDP Sustainability Objectives are similar to those sustainability objectives set out in paragraph 4.4.3 of Planning Policy Wales. Accordingly, in allocating the site in the Deposit LDP the Council has comprehensively and robustly assessed as part of the LDP process that the site is sustainable and in a sustainable location and is therefore compliant not only with the sustainability objectives of the LDP but also Planning Policy Wales.
- 5.12 With regard to the stage 1 assessment, the Council has published a Sustainable Settlements Appraisal Background Paper (September 2013). The methodology in this document follows the guidance in Planning Policy Wales (para 4.7.4) in adopting a settlement strategy which seeks to minimise the need to travel increased accessibility by sustainable modes and promote a broad balance between housing and employment opportunities to minimise significant commuting distances.
- 5.13 The Background Paper includes a sustainable settlement appraisal scoring system based on accessibility to services/ facilities, bus and rail services and proximity to employment and main settlements. St Athan is defined as a Primary Settlement and is ranked 7 out of the 87 settlements in the Vale of Glamorgan. The Background Paper states that the primary settlements offer a range of shops and facilities and some small employment sites. These settlements are well served by public transport, some with access to train services and have good bus service links.
- 5.14 The site lies adjacent to the settlement limits, relates well to the existing settlement and has existing built form along two of its boundaries. The site is therefore not an isolated parcel of land located within the countryside but adjoins the existing settlement of St Athans and is seen within the context of its existing built form.
- 5.15 With regard to the Stage 2 assessment the Council has established that there are no environmental or physical constraints which will prevent the site from being developed. This is a position which has been investigated further and in more detail, and which has been confirmed by the reports and assessments submitted with this detailed planning application (reported later in this section).

- 5.16 With regard to the Stage 3 Assessment a copy of the Council's Sustainability Appraisal of the site is included in Appendix C of this Statement with the main contribution to the LDP sustainability objective being the site's ability to provide opportunity to meet their housing needs.
- 5.17 The Council's proposed allocations of the site therefore clearly demonstrate the appropriateness of the site to provide for residential development, that the principle of development is therefore acceptable and there are no significant technical constraints to development. Furthermore, the proposed allocation confirms that the Council need the site to be developed in order to assist in providing for the Councils associated housing needs.

#### *Housing Land Supply*

- 5.18 Until January 2015, Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies allowed a Local Planning Authority (LPA) without a valid development plan to use the "past completions" method — as distinct from the "residual" method — to calculate its supply of land for housing.
- 5.19 The Council published its most recent Joint Housing Land Availability Study (JHLAS) in July 2014. Using the "past completions" method, it calculated that it had a 7.3-year supply of land for housing. With a base date of 01 April 2014, the JHLAS expired at the end of March 2015. Since January 2015, when TAN 1 was updated, LPAs have not been allowed to use the "past completions" method when calculating their supplies of land for housing.
- 5.20 In section 8 ("Transitional arrangements") of TAN 1 (January 2015), it is explicitly stated that an LPA without either an adopted LDP or a valid UDP (that is, one still within the plan period at the base date of the JHLAS) will not be able to demonstrate whether or not it has a five-year supply of land for housing.
- 5.21 The latter half of paragraph 8.2 states the following:
- "Those LPAs without an adopted development plan will be unable to produce a JHLAS until an adopted LDP is in place. However, local planning authorities without an adopted LDP should continue to carry out an objective assessment of their housing land supply on an annual basis in preparation for their LDP."*
- 5.22 Accordingly, the Vale of Glamorgan Council are unable to formally demonstrate their housing land supply position, and will accordingly be considered not to have a five-year housing land supply. Therefore, the need to increase supply should be given considerable weight in the determination of planning applications.
- 5.23 Whilst a formal study has not been published, the Council referred to a recent assessment of the housing land supply within their report to January's Planning Committee (14 January 2016 — see application 2014/01505/OUT):
- 5.24 While the most recent JHLAS indicated in excess of five years, it appears from the most recent assessment using the new method of calculation set out in TAN1 that the current is estimated to be 4.3 years (at April 2016) falling to 3.9 years at April 2017.
- 5.25 Furthermore, a further assessment of the housing land supply was provided by the Council in their report to planning committee on 12th May 2016 (in regard to planning application no. 2013/01279/OUT). This report confirms that the current housing land supply figure is approximately 3.6 years. This figure is clearly well below the Welsh Government's requirement to provide a 5-year housing land supply. In this regard, the Council's report goes onto confirm that:



- 5.26 "Therefore, and given that the current position appears to be less than 5 years, it is considered that this represents a very significant material consideration in favour of approving this residential development in advance of the adoption of the LDP, in order to maintain a healthy supply as required by PPW and TAN 1." (Page 45, Application no. 2013/01279/OUT)
- 5.27 In view of the Council's position in terms of the housing land supply, it is clear, as has been demonstrated above, that this position represents a very significant material consideration in favour of the now proposed development.
- 5.28 In view of the above, it is considered that a proposal for circa 300 houses would contribute to, and assist the Council in providing, a healthy supply of land for housing, in order to provide for local needs and demands.

#### *Sustainability*

- 5.29 As part of the evidence base for the emerging LDP, the Sustainability Appraisal Report (2011) provides an audit of services and facilities within the existing settlements in order to identify those which are potentially suitable to accommodate additional development in terms of their location, role and function. St Athan is defined as a Primary Settlement and is ranked 7 out of the 87 settlements in the Vale of Glamorgan. The Background Paper states that the primary settlements offer a range of shops and facilities and some small employment sites. These settlements are well served by public transport, some with access to train services and have good bus service links.
- 5.30 Specifically, St Athan has the following services and facilities located within close proximity:
- A Church
  - 2 Convenience Stores (Premier Stores & Londis)
  - A Pharmacy
  - A Primary School
  - Post Box
  - Bus services
  - 2 Leisure / Recreation facilities
- 5.31 Furthermore, the site is also located within close proximity to Eglwys Brewis (approx. 100m) and Llantwit Major (approx. 2 miles). Llantwit Major is identified as a Service Centre Settlement and has a significant number of services and facilities, including a train station, Primary and Secondary Schools, Church, a football club, a high street with shops, including a supermarket, coffee shop and pubs / bars.

#### *Conclusion*

- 5.32 The proposal put forward as part of this planning application, whilst currently being outside settlement limits, within the adopted plan should be considered within the context of a 'time expired' UDP with consideration being given to other material considerations. The scheme is located within a sustainably located area, and as confirmed by the numerous assessments undertaken as part of its allocation within the LDP is a suitable, and appropriate would in addition ensure that the Authority continues to provide for, and meet assessed housing needs.
- 5.33 It is considered accordingly that the principle of development is acceptable.

### Design

- 5.34 The proposed development aims to make the most efficient use of the site, whilst creating a high-quality living environment, as illustrated by the site layout plan.
- 5.35 Please refer to the design and access statement for further information and detail in respect of design and layout.

### Highways

- 5.36 Access to the development will be from Cowbridge Road. Three accesses are proposed in order to maximize penetration into the site and spread the load of traffic so that it is not focused on one location. The layout of each access will meet current minimum design standards in terms of geometry and visibility to ensure the safety of road users. It is proposed that the existing footway on the western side of Cowbridge Road, opposite the site, be upgraded to provide a shared pedestrian and cycle way in order to encourage active travel. Safe crossing facilities will be provided to link the site with this improved facility.
- 5.37 It is estimated that a development circa of 300 dwellings will generate some 140 to 160 peak hour vehicle movements. This is further reiterated within the Transport Assessment prepared by Acstro, which states:

*"The data suggests that the proposed 300 dwellings will generate some 1359 daily vehicle movements with 143 movements occurring during the morning peak hour and 153 during the evening peak hour."*

- 5.38 The impact of this additional traffic on Cowbridge Road, the streets of St Athan and the Gilestone Road/B4265 junction has been considered within the Transport Assessment and, suitable improvements to the Eglwys Brewis junction are proposed and further details will be agreed with the Highways Department.
- 5.39 A Public Right of Way PROW crosses the site. The site layout will be designed so that the PROW is retained either on its existing alignment or by making modest diversions to the route through the development.
- 5.40 The site is in a sustainable and accessible location where residents of the development will not be reliant on the car and can access day-to-day facilities on foot, by bicycle or by public transport. Safe means of access can be provided and it is considered that the development's traffic can be accommodated on the surrounding highway network.

### Ecology

- 5.41 A suite of ecological surveys have been carried out at the site by Terraqua Ecological Services, the results of which have guided the development design from an early stage to achieve a low ecological impact. The ecological baseline conditions at the site were established through a combination of desk study and the following survey techniques:
- Extended Phase 1 Survey;
  - Badger Survey;
  - Bat Surveys;
  - Otter Survey;
  - Reptile Survey
- 5.42 The full details, methodologies and findings of the above surveys are included within each report submitted.

- 5.43 The site comprises fields of agriculturally improved grasslands. Under the current management regime these areas of grassland have a low ecological value lacking the diverse sward associated with ecologically valuable grasslands.
- 5.44 Prior to its return to grassland management, some 3-4yrs ago, the fields were previously managed for crop growing. While under arable management a number of very rare and critically endangered plant species (Shepard's Needle and Corn Buttercup) were recorded by the County Plant Recorded as being present within the weed community. There is no evidence that these plants are currently present within the proposed development area despite an exhaustive search. There is a low possibility that these species remain within the seed bed, but their chances of germination are very low while the land remains as grassland.
- 5.45 Without appropriate mitigation these plant communities will be permanently lost regardless of whether the site is developed or left as grassland. The development of the site will allow for a mitigation strategy to be implemented in an attempt to restore these communities to land immediately north of the development site and ensure their permanent survival through appropriate management.
- 5.46 It should be noted that as part of the LDP Examination Hearing Session's Action Points, the Vale of Glamorgan Council propose to reduce the developable site area (from 10.9ha to 8.5ha) and the scale of development on the site from 300 units to 255 units in response to the constraints from the rare arable seeds.
- 5.47 However, due to the survey work undertaken, as outlined above, no evidence of those plants have been found on the site. Whilst there is potential that they currently remain within the seed bed, this will be lost over the next few years if no development commenced.
- 5.48 Accordingly, the proposed mitigation (which will seek to restore these species on land to the north) represents a significant gain over the no-development option (where the seed bank will be lost in time). Having regard to the proposed mitigation outside of the site boundary (but within the applicants control) there is no on-site constraints from the rare seeds, and accordingly, the development can progress across the whole site and therefore the development can provide the original 300 units.

#### Trees

- 5.49 The Arboricultural Impact Assessment undertaken by EDP recorded a total of 17 individual trees, eight hedgerows, eight groups of trees and one woodland item totalling 34 items.
- 5.50 Across the site there are; 20 category 'B' items of moderate quality and value; and eight category 'C' items of low quality and value. In addition, six 'U' category items were recorded, these items are considered unsuitable in the current site context.
- 5.51 As illustrated upon the Masterplan, 20 items have been graded as category 'B', and are of moderate quality and value, these trees have been prioritised for retention due to their condition, age and retention span – which will retain the existing character of the area and contribute to the LEAP / NEAP areas.
- 5.52 The proposals will result in the loss of 9 trees, 4 category B trees, 4 category C trees and 1 category U tree. However, it should be noted that the masterplan identifies that 22 of the surveyed items are unaffected by the development proposals, all of which will be retained.
- 5.53 The Masterplan shows the creation of hedgerows along the boundaries of the development. In addition, further planting is also indicated within the residential development, public open spaces and sustainable drainage features. The loss of nine items and the partial loss of a

further three is more than compensated for by the net quantity of new tree planting throughout the site.

#### Agricultural Land

- 5.54 A survey of the site has been carried out which confirms that the site is comprised of Grade 3b agricultural land at best. The site does not therefore contain any grade 1, 2 or 3a agricultural land and therefore does not comprise of the best and most versatile quality agricultural land and therefore this does not represent a constraint to development.

#### Flood Risk and Drainage

- 5.55 The majority of the site is located within Flood Zone 1 and is therefore not subject to any flood risk constraint. There is however a small strip of land along the path of the stream along the site's northern boundary that is within Flood Zone 2 & 3 which appropriately managed through the design of the development.
- 5.56 Surface water drainage is proposed to be discharged to the existing stream along the north-west boundary of the site. The stream is classed on the NRW flood mapping as a main river and discussions with NRW on discharge rates have begun. Surface water drainage is proposed to be discharged either into the ground or at an attenuated rate the existing stream.
- 5.57 Preliminary soakaway testing has also been instructed, however at the time of writing the soakaway test information was not available.
- 5.58 Foul water drainage for the 300 properties can be connected into the DCWW system as confirmed by DCWW in writing during the pre-application dialogue. The connection point is shown on the maps enclosed within the Shear Design Flood & Drainage report.
- 5.59 Accordingly, there are no significant flood risk or drainage constraints to the proposed development which cannot be overcome.

#### Archaeology

- 5.60 An assessment of the site undertaken by EDP concluded that the application site does not contain any world heritage sites, scheduled monuments, registered historic parks and gardens or listed buildings, where there would be a presumption in favour of their physical preservation in situ and against development.
- 5.61 No designated heritage assets within the vicinity of the site have been identified that are at risk of having their significance harmed by development within the site, either in terms of an effect on their physical form/fabric or through change to the contribution made by their setting.
- 5.62 A geophysical survey was carried out within the site that indicated the presence of below ground archaeological remains, consisting of circular and oval anomalies thought to represent infilled, ditched features. The survey was followed by an archaeological evaluation which excavated 31 trenches across the site including trenches targeting the geophysical anomalies. The evaluation characterised the south-eastern circular feature as the buried remains of an Early Bronze Age barrow, identifying a group of centrally located, cremation burials one of which is contained within an urn. The north-western oval feature was found to be a rock cut, ditched enclosure of unknown date. Elsewhere within the site, the evaluation recorded few archaeological remains, the only features consisting of a few undated infilled ditches and gullies.

- 5.63 The two ditched features were considered to possess a degree of significance, and it was agreed with Rob Dunning, Archaeological Officer at GGAT that they would be preserved in situ within a buffer zone of no less than 10m. These zones will represent a constraint to development within the defined areas.
- 5.64 The Archaeological evaluation report prepared by Worcestershire Archaeology has established that the site contains a number of archaeological features, quite broadly dispersed across the site, but with intensive areas of activity in localised areas. Please refer to the Evaluation report for further detail.
- 5.65 Overall, given the accurate correlation of the geophysical anomalies with the presence of archaeology, the lack of further anomalies in other parts of the site may indicate a real absence. It is possible, therefore, to suggest that large areas are devoid of significant archaeological remains. As such, the masterplan illustrates the most appropriate configuration in respect of the archaeological areas of interest and buffers provided.

#### Landscape & Visual Impact

- 5.66 A strategic landscape and visual appraisal has been undertaken by EDP and indicates that the potential effects of residential development on land off Cowbridge Road, on land east of Eglwys Brewis (allocated site), will not be detrimental to the character, designated assets or visual amenity of receptors within the local area and thus is considered acceptable in landscape and visual terms.
- 5.67 The appraisal further states that the site is considered to be relatively good for residential development in landscape and visual terms, in particular because the site has been considered by the Officers of the Vale of Glamorgan Planning Authority and is allocated for development in the emerging LDP under Policy MG2 (5) although, some tree removal is proposed to accommodate development in the small field.
- 5.68 As such, the potential effects of the proposed development are considered limited and localised, and are not felt to be contrary to local planning policy. Indeed, they conform to emerging policy, delivering much needed housing on a site earmarked for residential development within the emerging LDP.

## 6.0 SUMMARY AND CONCLUSIONS

6.1 The application proposals are considered to accord with planning policies at both the national and local level. In particular, it is considered that there are a number of material considerations in support of the application, which include the following:

- The site whilst currently being located outside of, but adjacent to the settlement boundary of St Athan and located within the Lower Thaw Valley Special Landscape Area. The sites' current designations should be considered within the context of the time expired UDP.
- Within the Emerging Deposit LDP, the site is located within settlement limits, and allocated for 300 residential units within the Emerging Deposit LDP: Policy MG 2 (5) – Land to the East of Eglwys Brewis, St Athan.
- The scheme is located in a sustainable location, as confirmed by the numerous assessments undertaken as part of the LDP allocation.
- The LDP allocation also established the principle of the development on this site.
- Using TAN 1 method of calculating, the Vale of Glamorgan only has a housing land supply of 4.3 years, predicted to fall to 3.9 in 2017.
- The proposed development aims to make the most efficient use of the site, whilst creating a high-quality living environment, as illustrated by the site layout plan.
- The Phase 1 Habitat Survey identified no evidence of the rare plants located on the site. This therefore poses no on site constraints to development and enables 300 dwellings to be located.
- The suite of ecological surveys which have been carried out at the site by Terraqua Ecological Services, confirm that despite the hedgerows and watercourse having high ecological value, the proposed development would not have a detrimental effect upon these areas with careful layout provisions and appropriate mitigation measures in place.
- The proposals will result in the loss of 9 trees, 4 category B trees, 4 category C trees and 1 category U tree. In addition, further planting is also indicated within the residential development, public open spaces and sustainable drainage features. The loss of nine items and the partial loss of a further three is more than compensated for by the net quantity of new tree planting and retention of existing landscape features throughout the site.
- The agricultural land classification report undertaken by Kernon Consultants confirms the site does not therefore contain any grade 1, 2 or 3a agricultural land and therefore does not comprise of the best and most versatile quality agricultural land and therefore this does not represent a constraint to development.
- The Flood and Drainage Statement prepared by Shear Design confirms the site can be considered to be at low risk of flooding from all sources provided adequate drainage measures are designed for the site
- The archaeological report prepared by EDP confirms a geophysical survey was carried out within the site that indicated the presence of below ground archaeological remains, consisting of circular and oval anomalies through to represent infilled, ditched features. The survey was followed by an archaeological evaluation which excavated 31 trenches across the site including trenches targeting the geophysical anomalies. The two ditched features were considered to possess a degree of significance, and it was agreed with Rob Dunning, Archaeological Officer at GGAT that they would be preserved in situ within a buffer zone of no less than 10m.
- The Strategic Landscape and Visual appraisal prepared by EDP confirms the potential effects of the proposed development are considered limited and localised, and are not felt to be contrary to local planning policy, in fact, they conform to emerging policy, delivering much needed housing on a site earmarked for residential development within the emerging LDP.

6.2 Having regard to the above material considerations, it is considered that the proposed development represents an appropriate form of development.

## **APPENDIX A**

### **Emerging LDP 'Matters Arising Changes '(MAC) Statement**



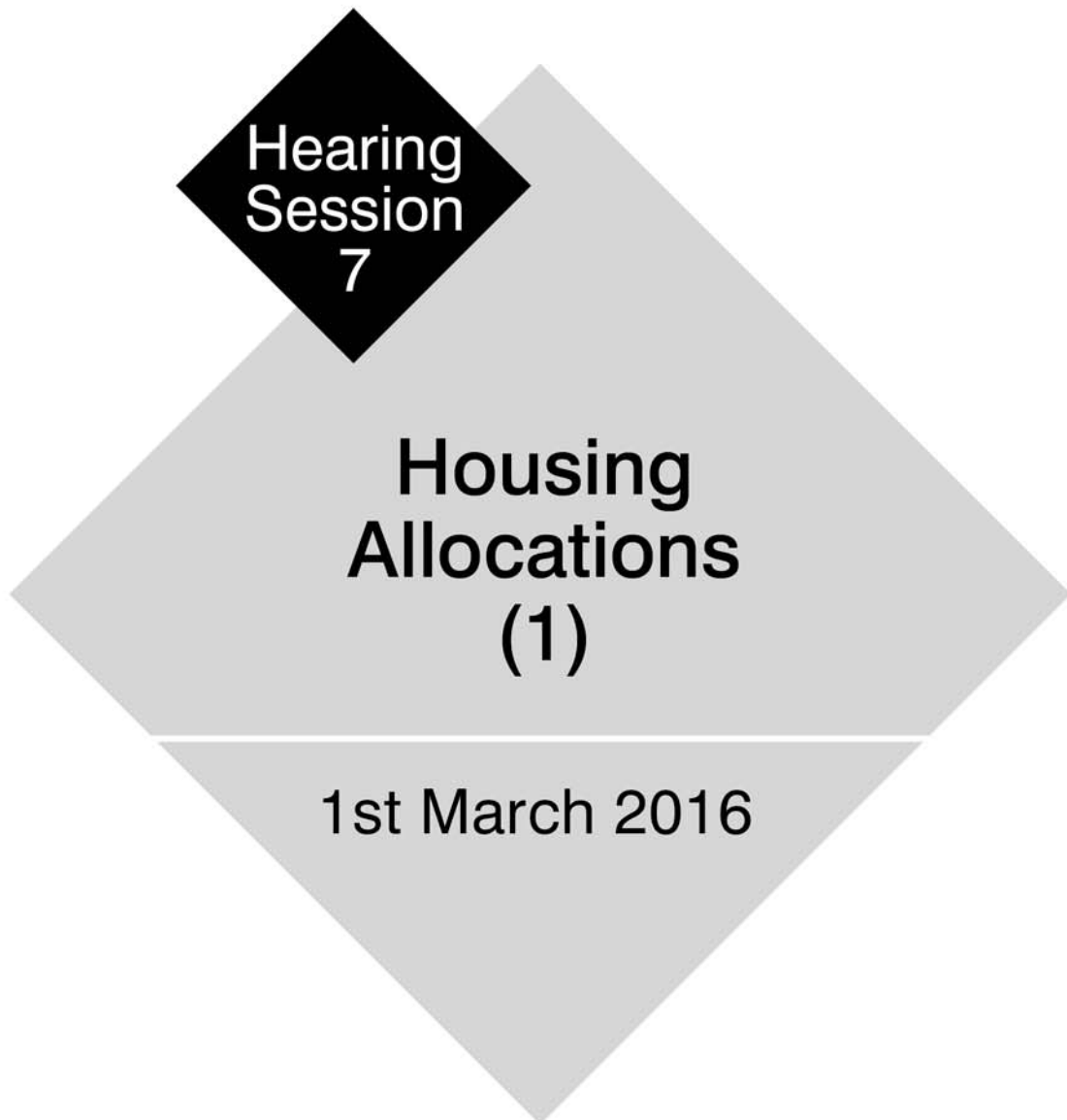
Vale of Glamorgan Council Local Development Plan Matters Arising Schedule

|                                                  |                                                               |                       | <p><b><u>connection to the public sewer system and/or any improvement work required. No improvements are planned within Dŵr Cymru Welsh Water's AMP 6 Capital Investment Programme (2015 - 2020). A scheme of upgrades for this WwTW will form part of DCWWs submission to the Industry Regulator Ofwat for AMP 7. Should a landowner/developer wish to progress the proposed development prior to the Regulatory investment, they may fund a feasibility study which will identify the improvements required.</u></b></p> <p>A Surface Water Assessment, including appropriate consideration of the use of SUDs, will also be required to demonstrate that there would be no adverse impacts arising from future development.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                           |         |         |         |       |                                                  |  |     |     |                           |  |
|--------------------------------------------------|---------------------------------------------------------------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------|---------|---------|-------|--------------------------------------------------|--|-----|-----|---------------------------|--|
| <b>MAC173</b>                                    | HS2&3/AP9<br>HS4/AP1<br>HS4/AP2<br>HS4/AP3<br>HS7/AP3<br>CC21 | Appendix 5<br>MG2 (5) | <p>Amend site specific detail in Appendix 5 for site MG2 (5) Land to the east of Eglwys Brewis as follows:</p> <table border="1" data-bbox="631 628 1839 767"> <thead> <tr> <th></th> <th>2011-16</th> <th>2016-21</th> <th>2021-26</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td><b>MG2 (5)</b> Land to the east of Eglwys Brewis</td> <td></td> <td>150</td> <td>150</td> <td><del>300</del><b>255</b></td> </tr> </tbody> </table> <p>This 10.9 hectare Greenfield site is located to the north of St Athan to the east of Cowbridge Road. <b><u>Affordable housing will be delivered in accordance with Policy MG4.</u></b></p> <p>The Council's Engineers have advised that a suitable safe access is required that conforms to current design criteria. <b><u>In addition, future planning applications must be supported by</u></b> <del>to be provided and</del> a comprehensive and robust Transport Assessment that evaluates and determines mitigation measures which alleviate any detrimental impact the development will have on the local highway network and associated road junctions.</p> <p><b><u>NRW have advised that the site may be affected by flooding, with some parts being identified as being within Development Advice Map Zone C1 / C2. All development proposals within this allocation will be required to demonstrate that they accord to national policy relating to flood risk as set out in TAN15. A site specific FCA / An updated site specific FCA must be submitted if any part of the planning application site falls within an area identified as being at risk of flooding.</u></b></p> <p>The Council's drainage engineer has advised that a designated main river runs along the boundary of the site.</p> |                           | 2011-16 | 2016-21 | 2021-26 | TOTAL | <b>MG2 (5)</b> Land to the east of Eglwys Brewis |  | 150 | 150 | <del>300</del> <b>255</b> |  |
|                                                  | 2011-16                                                       | 2016-21               | 2021-26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | TOTAL                     |         |         |         |       |                                                  |  |     |     |                           |  |
| <b>MG2 (5)</b> Land to the east of Eglwys Brewis |                                                               | 150                   | 150                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <del>300</del> <b>255</b> |         |         |         |       |                                                  |  |     |     |                           |  |

|  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
|--|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  |  | <p>and that a part of the site falls within flood zones 2 &amp; 3 as produced by Natural Resources Wales (NRW). Any application should clarify the present level of flood risk on the site and consider the suitability of the main river to accept any proposed surface water run-off. The suitability of the use of soakaways for the disposal of surface water run-off should be investigated, and an assessment should be undertaken into the potential for disposing of the surface water by means of a sustainable drainage system. A Surface Water Assessment, including appropriate consideration of the use of SUDs, will also be required to demonstrate that there would be no adverse impacts arising from future development.</p> <p><b><u>Dŵr Cymru Welsh Water has advised that a water supply can be made available to service the proposed development site; however extensive off-site mains may be required.</u></b> <del>Dŵr Cymru Welsh Water has advised that a</del> <b><u>A</u></b> hydraulic modelling assessment will be required to establish the point of connection to the public sewer system and/or any improvement work required and additional capacity <b><u>that</u></b> may be required. The site is crossed by a 150 mm foul public sewer and a 150 mm foul rising main for which protection measures in the form of an easement width and/or diversion will be required. There is also a Sewage Pumping Station (SPS) on the public sewerage network within this site, for which a Cordon Sanitaire or buffer zone <del>will</del> <b><u>may</u></b> be required in order to protect residential amenity. DCWW and VoG Environmental Health can advise further on this. <del>at the West Aberthaw Waste Water Treatment Works to accommodate this and other future developments in the area.</del> No improvements are planned within Dŵr Cymru Welsh Water's AMP 6 Capital Investment Programme (2015 - 2020). <b><u>A scheme of upgrades for this WwTW will form part of DCWWs submission to the Industry Regulator Ofwat for AMP 7. Should a landowner/developer wish to progress the proposed development prior to the Regulatory investment, they may fund a feasibility study which will identify the improvements required.</u></b></p> <p><del>Consultation with Natural Resources Wales will be required as the site is known to host a protected species and an ecological survey of the site will be necessary that details how any ecological issues identified will be mitigated.</del> <b><u>Natural Resources Wales (NRW) is aware that a European protected species has been recorded in the vicinity of the site and an ecological assessment will be required in support of any future planning application.</u></b></p> <p>A detailed survey according to the 'revised guidelines and criteria for grading the quality of agricultural land' (MAFF 1988) will be required to confirm agricultural land grading.</p> <p>A number of high amenity value trees are located in the southern corner of the site and these should be</p> |  |
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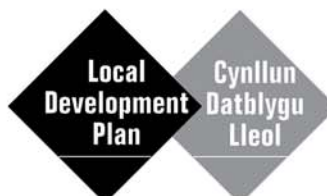
## **APPENDIX B**

### **Vale of Glamorgan Council's Hearing Statement – Hearing Session 7 - Housing Allocations (1)**



Vale of Glamorgan Council Examination Statement

February 2016



## **Site MG2 (5) – Land to East of Eglwys Brewis, St Athan**

- **What is the current status of the site?**

This greenfield site was not submitted as a candidate site but was allocated by the Council following discussion with the landowner in order to support the St Athan Strategic Opportunity Area. No formal planning application has been submitted to date, however, the Council has received confirmation from the landowner and their agents that they are still interested in developing the site for residential use following adoption of the Plan.

- **What is the size of the site and how many units will be delivered on site?**

The site is 10.9 Ha and was originally allocated for 300 units at a density of 27.5 dwellings per hectare (dph). This is lower than the required density by policy MD7 to allow for nature conservation and flooding constraints as the site partially lies within a C2 flood zone (approximately 0.35 hectares). During the Deposit Plan public consultation NRW identified the existence of rare arable weeds on the site (corn buttercup and shepherd's needle). In response a Conservation Management Strategy has been prepared by the landowner (document SD69). This indicates an area of approximately 2 hectares is required to be undeveloped and managed to conserve the rare arable weed (area A1 illustrated at Figure 1 in document SD69 – also see appendix G. This would reduce the net developable area to 8.5 hectares resulting in 255 dwellings being deliverable on the allocation, resulting in a density of 30 dwellings per hectare. It is proposed to amend the allocation to 255 dwellings in Policy MG2 to reflect this constraint. This will be undertaken as part of work to update the Policy MG2 to reflect the most up-to-date position (Action Point 3, Hearing Session 2).

It is not considered that the revised level of housing proposed for the site would constitute over-development or have a negative impact on the surrounding area. Details of layout, scale, form, height and density will be addressed within development proposals through the application process; which will respond to the local character and context of the built environment and landscape setting, whilst promoting the efficient use of land and developing at highest practicable densities.

- **Would the site contribute to the aims and objectives of the Plan?**

The site is a strategic site identified for residential development in the St Athan area. The residential site allocation contributes toward achieving the aims and objectives of the plan by bringing forward new homes which background evidence demonstrates are clearly needed in the Vale of Glamorgan (set out within SD23, and SD46 / ED17).

The housing allocation will make an important contribution towards achieving the aims and objectives of the Plan by bringing forward a significant number of new homes which are needed in the Vale of Glamorgan over the Plan period (Objectives 1 and 7 refer). The development of this residential site will also provide for affordable and family housing and help towards providing a range and choice of new homes in the St Athan area offering different tenures, types and locations to meet Objective 7. In addition, the site will contribute towards the development of sustainable communities, reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and in turn seek to ensure that development makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change (Objectives 1, 3 and 2 refer respectively). The allocation will also help to support the retention of existing services and facilities in the vicinity (Objective 5 refers).

In addition to meeting location housing needs the identification of the strategic housing site in the St Athan area reflects the importance of the St Athan Strategic Opportunity Area identified under Policy SP2. The site is considered to support the development needs of the Strategic Zone at St Athan and provide the opportunity for future employees to live in the area in support of Objective 3, 7 and 8.

- **Is the allocation of the site consistent with the Plan's Spatial Strategy?**

Yes. The LDP Strategy states "To promote development opportunities in Barry and the South East Zone. The St. Athan area to be a key development opportunity and Cardiff Airport a focus for transport and employment investment. Other sustainable settlements to accommodate further housing and associated development."

The site is located within St Athan which is identified within the Plan as a Strategic Opportunity Area and a primary settlement i.e. a settlement that plays an important role in meeting housing need and providing some key local services and facilities and which caters for the needs of residents and the surrounding wider community.

The Plan's Spatial Strategy recognises that the St Athan area is a key development opportunity due to the planned major investment at MOD St Athan as part of the St Athan and Cardiff Airport Enterprise Zone. The allocation of the site therefore reflects the strategic importance of the St Athan area and recognises the need to ensure the sufficient provision of residential land to meet local needs and to support planned economic growth at the St Athan Strategic Opportunity Area by providing the option to meet housing needs near the strategic employment growth.

- **Are there any significant constraints or barriers to the development of the site?**

Representations from NRW on the Deposit LDP identified that the site supports populations of rare arable weeds including the critically endangered corn buttercup (*Ranunculus arvensis*) and Shepherds Needle (*Scandix pecten-veneris*) which are critically endangered plant species in the UK. In response a Conservation Management Strategy has been prepared by the landowner (document SD69). This indicates an area of approximately 2 hectares is required to be undeveloped and managed to conserve the rare arable weed (area A1 illustrated in Figure 1, document SD69). This would reduce the net developable area to 8.5 hectares resulting in 255 dwellings being deliverable on the allocation, resulting in a density of 30 dwellings per hectare. It is proposed to amend the allocation to 255 dwellings in Policy MG2 to reflect this constraint. This will be undertaken as part of work to update the Policy MG2 to reflect the most up-to-date position (Action Point 3, Hearing Session 2). NRW in their Focused Changes Representation have advised that they are satisfied with the proposed Conservation Management Strategy and this has overcome their earlier concerns. Consultation with Natural Resources Wales will be required as the area is known to host a protected species (such as Great Crested Newts) and a detailed ecological survey of the site will be required.

Dŵr Cymru Welsh Water (DCWW) has advised that a hydraulic modelling assessment will be required to establish the point of connection to the public sewer system and/or any improvement work required. DCWW have advised that water supply can be made available to service the proposed development however off-site mains may be required. The West Aberthaw Waste Water Treatment Works (WWTW) is currently overloaded and should a landowner/developer wish to progress the proposed development of the site prior to DCWW regulatory investment, they may fund a feasibility study which will identify any improvements needed.

The site is crossed by a 150mm foul public sewer and a 150mm foul rising main which is located in the eastern corner of the site for which protection measures in the form of an easement width and / or diversion will be required (see appendix H). There is also a Sewage Pumping Station (SPS) on the public sewerage network to the east of the site, for which a Cordon Sanitaire or buffer zone will be required in order to protect residential amenity. DCWW and VoG Environmental Health can advise further on this.

A detailed survey according to the 'revised guidelines and criteria for grading the quality of agricultural land' MAFF 1988 will be required to confirm agricultural land grading. In addition, a number of high amenity value trees are located in the southern corner of the site and future development proposals should consider their retention.

- **Are there any infrastructure requirements for this site and how/when will they be delivered?**

Yes. The site specific infrastructure requirements for this site are set out in Appendix 1 of the Council's Draft Infrastructure Plan (SD65), Appendix 5 of the LDP and in the Infrastructure and Site Deliverability Statement (SD25). The Council intends to update this information under Action Point 3 from Hearing Session 4 to reflect any factual changes. There are no major or abnormal infrastructure requirements identified as necessary for the delivery of this site. However, it is noted that further discussion may be required with DCWW to establish the likely inclusion of the upgrade to the West Aberthaw Waste Water Treatment Works (WWTW) in their next AMP, if not this may affect development viability but not to such an extent as to warrant the site undeliverable. The infrastructure requirements will be considered further through the planning application process and where necessary secured through planning conditions and section 106 / section 278 agreements in accordance with policy MD4, and be appropriately phased to be delivered as the site is developed.

- **What are the proposed timescales for delivery of this site?**

The Council's Housing Land Supply Trajectory (ED08.1) indicates the site will commence by 2021-22 and will be completed by 2025-26.

- **Has a development viability assessment been carried out? If so, what are its conclusions?**

No site specific viability assessment has been undertaken to date. However, the Plan is supported by an area wide viability appraisal set out within the Affordable Housing Viability Study (2013), which was updated in 2014 (SD30 and SD24 refer respectively). The findings of the updated report indicate that the Vale of Glamorgan has amongst the highest house prices in Wales, which generates significant residual land values and provides sufficient development viability to deliver the affordable housing targets set out in Policy MG4.

The benchmark residential land values within the assessment include a 'viability cushion' which indicates that exceptional and other unexpected costs can be accommodated whilst providing the levels of affordable housing identified (SD24, Table 5.1, Page 21).

Therefore, the Council considers that future development proposals on this site would be able to deliver 35% affordable housing together with all other planning obligations in



accordance with the Council's draft Planning Obligations Supplementary Planning Guidance (ED15).

- **What would be the implications of the site and/or supporting infrastructure not coming forward within the anticipated timescales for delivery of the Plan's housing and development strategy?**

The Council considers that the site is deliverable and that there are no insurmountable infrastructure requirements or other constraints that would hinder the development of the site with the Council's anticipated timetable. Delivery of the site is not reliant on any strategic infrastructure and the Plan's policies set out how the impact of the development of the site can be managed.

Notwithstanding this, the Plan includes a 10% flexibility allowance (950 dwellings) and therefore the Council considers there to be sufficient flexibility within the Plan and if this site did not come forward for the 255 dwellings proposed (as amended) within the Plan period it would not undermine the overall Plan's housing and development strategy as there are sufficient range and choice of sites identified within policy MG2 to deliver the overall strategy allowing for a degree of flexibility.

The delivery of housing will be monitored in the Annual Monitoring Reporting process using data obtained through the Joint Housing Land Availability Studies. The monitoring framework will therefore identify areas where there may be a need to consider potential plan or policy reviews, including any site allocations where Plan deliverability issues arise.

## **APPENDIX C**

### **Vale of Glamorgan Council's Sustainability Appraisal for MG2 (5) – Land to the East of Eglwys Brewis, St Athan.**

| Sustainability Objectives |                                   | 1                                                                 | 2                                                              | 3                                      | 4                                | 5                                                 | 6                                                               | 7                 | 8                                       | 9                                                                    | 10                                                                | 11                                                                                                        | 12                                                                                     | 13                                                                 | 14                                                                                   | 15                             |
|---------------------------|-----------------------------------|-------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------|----------------------------------|---------------------------------------------------|-----------------------------------------------------------------|-------------------|-----------------------------------------|----------------------------------------------------------------------|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------------|
| Site No.                  | Location                          |                                                                   |                                                                |                                        |                                  |                                                   |                                                                 |                   |                                         |                                                                      |                                                                   |                                                                                                           |                                                                                        |                                                                    |                                                                                      |                                |
| 5113/CS1                  | Land to the east of Eglwys Brewis | +                                                                 | +                                                              | +/-                                    | +                                | 0                                                 | +/-                                                             | -                 | --                                      | -                                                                    | 0                                                                 | 0                                                                                                         | -                                                                                      | 0                                                                  | +                                                                                    | 0                              |
|                           |                                   | To provide the opportunity for people to meet their housing needs | To maintain, promote and enhance the range of local facilities | To maintain and improve access for all | Reduce the causes of deprivation | To maintain, protect and enhance community spirit | To minimise the causes and manage the effects of climate change | To minimise waste | To use land effectively and efficiently | To protect and enhance the built environment and natural environment | To provide a high quality environment within all new developments | To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage | To reduce the need to travel and enable the use of more sustainable modes of transport | To provide for a diverse and wide range of local job opportunities | To maintain and enhance the viability of the Vale's town, district and local centres | To promote appropriate tourism |