

O'Keefe, Kevin T **2014/00242/FUL** **APPENDIX A**

From: Jane Corwin [colwinstoncc@gmail.com]
Sent: 01 May 2014 21:01
To: Planning & Transportation (Customer Care)
Subject: Application 2014/00242/FUL
Attachments: Redrow Appl. - Final.doc; LDP - Final version.doc; Appendix to Community Council Representation.pdf; Final Appendix 3 Report to CCC April 30 2014.pdf

FAO Robert Lankshear

Dear Mr Lankshear

I now attach the final submission from Colwinston Community Council re the application from Redrow to build 62 houses in the village.

Could you please acknowledge safe receipt of this email and attachments?

Yours sincerely

Jane Motte
Clerk to Colwinston Community Council

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NO: 840
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02 MAY 2014
ENVIRONMENTAL
AND ECONOMIC
REGENERATION

COLWINSTON COMMUNITY COUNCIL

PLANNING APPLICATION NO. 2014/0242/FUL

LOCATION : LAND TO REAR OF ST DAVID'S PRIMARY SCHOOL

PROPOSAL : RESIDENTIAL DEVELOPMENT OF 62 HOUSES

Preface

Colwinston Community Council has given detailed consideration to the above proposed development and the observations set out below take into account views and representations made by individual residents and of those expressed at well-attended village meetings, the latest being held on 25 March 2014. We would also note that in 1988 a previous planning application for a similar proposal was refused on the grounds of preserving the countryside; extending the village beyond reasonable limits and site access being next to the school and on a bend in the road.

Our strong objection to the Redrow scheme, therefore, is submitted on the basis that the project is contrary to the provisions of the adopted Unitary Development Plan and comprises unsustainable development that fails to respect the character of the local area and build on its positive elements. The sustainability credentials of the project are suspect and additional undesirable consequences of the development are apparent when all aspects relating to the development are considered.

Background Information

Colwinston is a small mainly agricultural village of some 155 dwellings granted Conservation Area status in 1970. It includes a Site of Importance for Nature Conservation (SINC 147) within its boundary and it also forms part of the main route of the Valeways Heritage Millennium Trail. The road system within the Village comprises narrow lanes where two-way traffic is a problem in many places and utility services are working to capacity. There is no mains gas supply, no public transport system, village shop or a public telephone box and mobile telephone signals range between poor to non-existent.

The proposed site is located outside the village settlement boundary on good agricultural land directly behind St David's Church in Wales Primary School and immediately adjacent to the Conservation Area.

Required Considerations

Section 38 of The Planning and Compulsory Purchase Act 2004 requires that the Council determine an application in accordance with the development plan unless material considerations indicate otherwise. The Applicant Company's Design & Access statement (DAS) makes the case for other 'material considerations', including the argument that the Council's UDP is now out of date. Many UDP policies, however, are still supported by national guidance in PPW and the TANs. For development to be sustainable, it needs to be soundly based on good environmental assessment and be able to be well controlled with regard to its environmental impact.

Planning Policy Framework

The Development Plan for the area comprises the Vale of Glamorgan Unitary Development Plan 1996-2011, which was formally adopted by the Council on 18 April 2005, and within which the following policies are of relevance:-

STRATEGIC POLICY 2 – SUSTAINABLE DEVELOPMENT
ENV1 – COUNTRYSIDE PROTECTION
ENV2 – PROTECTION OF AGRICULTURAL LAND
ENV17 – CONSERVATION AREAS
ENV27 – DESIGN OF NEW DEVELOPMENTS
HOUS2 – ADDITIONAL RESIDENTIAL DEVELOPMENT
HOUS8 – RESIDENTIAL DEVELOPMENT CRITERIA
HOUS11 – RESIDENTIAL PRIVACY AND SPACE
HOUS13 – AFFORDABLE HOUSING
HOUS14 – SAFE VEHICULAR ACCESS

Strategic Policy 2 relates to sustainable development and states that proposals will be favoured provided they contribute to energy conservation, minimise the need to travel – especially by car, reclaim derelict or degraded land and utilise high standards of design.

Policy ENV1 of the UDP highlights the need to strictly control development in rural areas.

Policy ENV2 protects the best and most versatile agricultural land.

Policy ENV17 highlights the need for new developments within or adjoining Conservation Areas to preserve or enhance the character of the area concerned.

Policy ENV27 requires that new developments to be of a high standard of design and have regard to the context of the environment within which they are proposed.

Policy HOUS2 identifies those urban and rural settlements within which infill, small-scale development and redevelopment will be permitted, or small-scale rounding off considered.

Policy HOUS8 is of particular relevance which states that subject to the provisions of Policy HOUS2 development will be permitted which is within or closely relates to the defined settlement boundaries provided that it meets all the following relevant criteria:

- (i) The scale, form and character of the proposed development is sympathetic to the environs of the site
- (ii) The proposal has no unacceptable effect on the amenity and character of existing or neighbouring environments by virtue of noise, traffic congestion, exacerbation of parking problems or visual intrusion.

- (iii) The provision of car parking and amenity space is in accordance with the Council's approved guidelines.

Policy HOUS11 seeks to ensure that existing areas characterised by high standards of privacy and spaciousness are protected against over development and insensitive.

Relevant material considerations comprise:

- (i) National Planning Policy

Planning Policy Wales (Edition 5, 2012) sets out the following advice:-

9.3.4 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. High quality design and landscaping standards are particularly important to enable high density developments to fit into existing residential areas.

- (ii) Technical Advice Notes:

TAN 12 : Design

5.53 The design of housing layouts and built form should reflect local context, including topography and building fabric. Response to context should not be confined to architectural finishes. The important contribution that can be made to local character by contemporary design, appropriate to context, should be acknowledged. To help integrate old and new development and reinforce hierarchy between spaces consideration should be given to retaining established routes, mature trees and hedgerows within housing areas as well as introducing new planting appropriate to the area.

- (iii) TAN 22: Sustainable Buildings

- (iv) Adopted Supplementary Planning Guidance

- Amenity Standards
- Trees and Development
- Sustainable Development
- Design in the Landscape
- Biodiversity

The Vale of Glamorgan Unitary Development Plan has been examined to test the proposal against its relevant objectives. Colwinston Community Council believes there are no material considerations that suggest the proposal should be allowed. For reasons provided further in this submission, it is considered that the proposal conflicts with national and local planning policies to such an extent as to justify withholding planning permission

Planning Assumptions and Housing Need

The planning statement produced by Redrow makes much of the fact that the proposed site was included in the last Draft LDP and implies that a principle has been established for, and the Local Planning Authority supports, a far larger housing development than other planning policies would allow.

We would point out that LDP 2013 was a document for public consultation and the proposed candidate site was only included due to flawed scoring of most of the sustainability objectives; (see Pages 7-10 of our detailed Representation in relation to Policy MG2 (38) at Appendix 2). In practical terms that site would no more comply with sustainability objectives than the current proposal under consideration. It is part of the planning process that the Draft LDP could well have been amended following consultation, and the number of Representations objecting to that site, had it not been withdrawn following criticism from the Welsh Government.

In particular the WG were also concerned with the scale and size of development in minor rural communities like Colwinston that could encourage reliance on the car and compound infrastructure problems in rural locations. They also considered that any loss of agricultural land be minimised and only used when fully justified as set out in PPW paragraph 4.10.1. It is quite likely therefore that in the light of Welsh Government criticism and strong local objections (both for the same reasons) that this site will be drastically reduced in numbers or deleted altogether from the emerging Draft LDP.

In their planning statement Redrow refer to a severe housing shortage in the Vale and point out that, from a Report dated October 2013, the supply of existing available housing land is only enough for the next 4.42 years rather than the 5 year requirement. However the latest figures for population growth published at the end of last year show an estimated increase of less than 6000 over the period to 2026. It is impossible for us to understand how this population increase translates into the need for up to 11000 houses. The new housing need figures have yet to be published but, if calculated in the normal way, they will clearly show a similar reduction to those for population growth. If these latest figures of population growth and housing need were used in conjunction with the additional development approvals since October last, and those in the pipeline, it would almost certainly push the supply of housing land estimates over the 5 year requirement.

Unitary Development Plan Context/Circumstances Relating to Project

Countryside/Landscape Protection

National guidance at paragraph 5.1.1 of PPW recognises the importance of protecting the natural heritage of Wales both for its own sake and for the health and the social and economic wellbeing of individuals and communities. PPW accepts that new house building in the countryside should be strictly controlled and paragraph 9.3.1 requires that new housing should be well integrated with and connected to the existing pattern of settlements, with the expansion of towns and villages avoiding the creation of ribbon development, the coalescence of settlements or a fragmented development pattern.

The Unitary Development Plan aligns with the aforementioned advice (Policy ENV1) and seeks to protect minor rural settlements from inappropriate development. In this respect Policy HOUS 2 refers to "small-scale development which constitute 'rounding off' of boundaries of rural settlements and being no more than 5 dwellings". Related Policy HOUS 8 sets out a series of criteria to be met that include:-

- (i) scale, form and character of the development as being sympathetic to the environs of the site;
- (ii) there is no unacceptable effect on the amenity and character of existing or neighbouring environments of noise, traffic congestion, parking or visual intrusion;
- (iii) the proposal does not have an unacceptable impact on good quality agricultural land, on areas of attractive landscape;
- (iv) adequate community and utility services exist, are reasonably accessible or can be readily and economically provided.

Welsh Government has expressed concern about the scale and size of development in minor rural communities (like Colwinston) that could encourage reliance on the car and compound infrastructure problems in rural locations. It also considers that any loss of agricultural land should be minimised and only released to accommodate new development when fully justified.

Although not considered to be a material consideration, housing policy under the emerging Local Development Plan (LDP) directs new development to sustainable locations to support the needs of the local community (LDP objective 7 and Policies MD 1 and 2). Since there are no employment opportunities in the village, demand for local housing need is minimal. Policy MD 6 (Development Within Minor Rural Settlements) states that new development should "comprise infilling or limited small-scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing". Policy MD 11 (Affordable Housing in Rural Areas) states "any affordable housing scheme will need to be of a scale proportionate to the size of the existing settlement".

Whilst Colwinston Community Council fully recognises the need for a smaller number of affordable houses, such development could be accommodated by normal infill and use of a smaller alternative site listed in the Alternative Site Register at reference ASN 15.

This proposed major housing development is excessive, unsympathetic to the environs of the site and fails all requirements outlined in Policy HOUS 8. The 'out of accord' proposal does not align with UDP Policy ENV 1 and there are no material considerations to suggest that it should be granted planning permission.

Conservation

Rural landscapes are generally viewed from a wide prospect and overall this development will have a disproportionate effect on its surroundings. A direct line of sight can be achieved from the rear of properties on the north side of Hen Cartref, Yew Tree Close, Beech Park, The Vines and the road leading into the Conservation Area. Occupiers of many houses overlooking the site will have their appreciation of open fields either outwards from, or inwards to, the Conservation Area either partially or totally blocked. Suspiciously open-ended private drives/culs de sac along the eastern flank of the development will not provide comfortable viewing from the surrounding rural area and public footpath. UDP Policy ENV17 indicates that development proposals which have a detrimental effect on the setting of a Conservation Area will not be permitted. In addition, the Conservation Area Appraisal and Management Plan recommends resisting any development applications for change on the edges of the Conservation Area which would have a detrimental effect on an area's setting. It also recommends that any development respects the important views within, into and from the Conservation Area and that development proposals of open areas that contribute to its character should be opposed. Furthermore it makes clear that the Conservation Area setting is just as important as its architectural heritage.

Both the Unitary Development Plan and Deposit Local Development Plan offer no encouragement to over-developed edge of settlement housing schemes that do not preserve and enhance Conservation Areas or create high quality and locally distinct places. Importantly it should be noted that the Vale of Glamorgan Council has a legal duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to "preserve and enhance" Colwinston Conservation Area.

Suggested Housing Density/Layout

A rigorous appreciation of density is crucial to realising the optimum potential of a site and in this respect there are real problems with the form and extent of the suggested proposal. Put simply, the Applicant Company has failed to incorporate acceptable Development Plan requirements into the project. Achieving sustainable development on the land does not mean that any density for housing is acceptable. To rely upon that argument and not to move on to consider the other factors would be both a failure to comply with section 38(6) of the Act and in any event not good planning. Indeed, such an approach would not be consistent with PPW which recognizes the importance of local character and overall scale, density, massing, height, landscape and layout and access of new development in relation to neighbouring buildings and the local area.

The housing numbers proposed (62) and the varied scale, form and layout of buildings to achieve it would prove to be harmful to the character and appearance of the area and cause unacceptable harm to the living conditions of neighbours. The requirement of planning policy to take into account local context and character is paramount. The aforementioned impacts are clearly unacceptable and conflict with relevant planning policy. The scheme therefore

fails to align with identified criteria concerning the need to provide the site with the high quality design response it merits.

Redrow's Landscape and Visual Assessment states in paragraph 4.4 that "The eastern boundary structural landscape will provide a defensible boundary to further development". In relation to the LDP consultation, however, they submitted an alternative site amendment (reference ASA 13) extending the application site into the adjacent 3 fields. Such intent reinforces local opinion that Redrow are more concerned with profit than local character or adhering to adopted policies in the Development Plan.

The density of development proposed is more akin to that expected within or adjoining primary settlements. There is no clear and transparent evidential basis to conclude that the application represents an all or nothing position, as it has not been contended that there is no viable alternative smaller scheme to meet demand or local needs.

Analysis of Design Quality & Layout

Both national and local design policies seek to create high quality, attractive, sustainable places which enhance the community in which they are located. The Redrow proposal is uninspiring, fails to retain local distinctiveness and character and does not appear to have been thoughtfully designed for its specific location. In part, this is exemplified by the 'backland' affordable housing element of the project being 'squeezed' between the rear of dwellings fronting the site's main access road and the eastern boundary of the Primary School. Colwinston Community Council and local residents cannot understand how such arrangement contributes to enhancing the setting of the Conservation Area. In reality, the proposal comprises a poorly landscaped suburban edge of settlement development that blurs the boundary between the countryside and Colwinston with a pattern and design of housing which "could be anywhere".

Impact on Neighbours

Planning Policy Wales indicates that a balance must be struck in all planning decisions between facilitating developments on the one hand and safeguarding the environment and assets of recognised importance on the other. A supporting Technical Advice Note TAN (12) – Design indicates that a proposed development's relationship to its surroundings are material considerations in determining planning applications.

UDP Policy ENV29 provides explicit guidance that developments should have regard to the character of the local area and should both improve it and build on its positive elements. Supporting text confirms that where development takes place adjacent to housing, consideration must be given to the residential amenity of the adjoining homeowners. While some adverse change to the setting of existing housing may be the inevitable consequence of new development, that change must be minimised. At no time should it unreasonably affect the quality of life of neighbours.

Redrow's Design & Access Statement is particularly coy with regard to the impact the proposal will have on occupiers of nearby property. Potential overlooking of gardens from the proposed development is a major concern and it is not surprising that the Company has been parsimonious in relation to its treatment of occupiers of adjoining dwellings, as it wishes to maximise the number of units to be erected on the land. The submitted layout plan confirms, however, that the development would have a pronounced and detrimental impact on the amenity of residents.

From a community impact perspective, the proposed landscaping is woefully inadequate and the distance between existing dwellings and a number of those proposed on the application site is not considered sufficient to provide satisfactory outlook/relationship. This perceived problem supports the belief that the suggested housing scheme comprises over-development of the site.

Highways and Traffic

Redrow's traffic survey suggests that the increase in car movements in and out of the village and on the A48 junction at Crack Hill from the proposed development would be minimal. The criteria and assumptions used in that survey just do not apply to the Colwinston situation. There is no employment in the village and, other than the primary school, pub, church and village hall, all other services and facilities are between 5 and 8 kilometres away in Cowbridge or Bridgend. There is no scheduled village bus service and access to the nearest public transport is over a kilometre walk away on the A48 road. Against this background almost all existing families have 2 cars and indeed Redrow have planned parking for at least 2 cars for each house. It is also reasonable to assume that at least one adult in each new household is working and so there would be a minimum of 62 car movements out of the village in the morning rush hour and back again in the evening. Even allowing just half the households using the second car during the day for shopping and other services not in the village this is a conservative estimate of some 200 car movements in and out of the village each working day. This does not take into account service vehicles, visitors etc.

There is also the issue of the site being adjacent to the school where there are major traffic problems morning and evenings such that an unofficial one-way system operates anti-clockwise round the village. Cars turning right out of the site to gain access to the A48 will be travelling against the flow and faced with an immediate bend in the lane that would not accord with visibility standards at junctions set out in TAN 18 guidance. This raises important safety issues in relation to site access being directly next to the school entrance on one side and facing a sharp bend in the road on the other side. The significant increase in traffic flow, particularly during the morning and evening rush hours, will create an unacceptable accident risk to children, parents and drivers alike. Current policy states that new developments should be permitted only where they will have no unacceptable impact on highway safety and would not cause or exacerbate existing traffic congestion.

The Highways Engineers are clearly aware of all these problems and, with the more realistic estimate of a significant increase in traffic flows, would also need to think about widening the village lanes that are only 1.8 metres wide in some

places and without pavements for pedestrians. In addition the junction onto the A48 at the top of Crack Hill (the nearest access to the proposed site) will need to be improved. For instance the designated right turn lane into the village is sometimes already too short for existing traffic and without being extended will leave some vehicles backing up into the overtaking lane up the hill. It will inevitably lead to an accident at some stage! At the same time there is no slip road off the west bound road at this junction where traffic travelling at 60mph suddenly slows to 10-15mph when a car turns left into the village. While most traffic will use the Crack Hill junction for access to and from the village the increased number of cars will inevitably mean more use of the lane leading out to the junction with the A48 at Twmpath. This has no slip road from the east and a blind dip in the A48 to the immediate west which again would fail TAN 18 guidelines. There have already been serious accidents at this junction. Overall the additional traffic generated by a site of this magnitude cannot be accommodated with any degree of safety.

Sustainability

Although Redrow believes otherwise, it is not considered that evidence supports the case for the site being in a truly sustainable location as future residents would be almost entirely dependent on the private car for access to shops, leisure, higher education, etc. contrary to Strategic Policies 2 and 8 of the UDP.

As regards the sustainability of the development itself, a Code for Sustainable Homes Level 5 would not be an exemplar for sustainable development. Even if the proposal could be provided with the highest quality of sustainable homes there is no justification for an exception to be made in this case since the Council's local planning policies align with national guidance. These include the Council's SPG on Sustainable Development, which was cited within the Welsh Assembly Government's consultation on "Planning for Climate Change" (December 2006) as an example of where the planning process can actively address climate change at the local level.

The proposal does not align with Policies HOUS 2 and HOUS 8 as it exceeds 5 dwellings. Housing stock within the village would increase by nearly 40%, car numbers by 100 or more and inhabitants by perhaps 200 or more. This amounts to a development grossly out of scale with the character of the Conservation village and is completely unsustainable given that utility services are at capacity or worse, there is no public transport, no mains gas, no shop and community services limited or non-existent. To rectify this situation would be at a cost out of all proportion to the viability of the proposed development.

There is no justification either in local or national policy to allow for the proposed development to be located in this unsustainable countryside location.

Flood Risk/Sewerage/Water Supply

After heavy and prolonged rain during each winter of recent years the land along Heol Faen valley becomes saturated, the water table rises and a surface

stream appears. This flows south towards the head of Beech Park where it enters a drainpipe system running underground to Church Lane where it joins the outflow from the Vines attenuation tank. When this flow overwhelms the drains it backs up behind Beech Park causing a large pond to form and flooding which overflows into the sewerage system at Quarry House. This in turn overloads the Pumping Station and Attenuation Tank with the result that sieved sewage discharges towards Colwinston Brook via a gully alongside the road that then becomes an open sewer. When the sewerage overflow combines with the surface water run-off the bridge area of the brook floods and makes the road impassable for pedestrians and cyclists. The Brook itself creates a wide flood plain cum swamp in adverse weather conditions inhibiting the free-flow of sewage causing flooding back to the Pumping Station. All this creates a serious health risk for long periods after flooding has abated and from time to time flood damage to dwellings in Beech Park and beyond. Photographs and narrative are attached at Appendix 1 illustrating the history of this problem.

UDP Policy suggests that new development in areas liable to flooding will not be permitted unless it can be demonstrated that they can be properly protected without putting other areas at risk and that mitigation measures can be sympathetically assimilated into the environment.

Both the Local Planning Authority and Welsh Water are well aware of continuing problems at Colwinston and the Vale Council's Drainage Engineers confirmed in relation to the Draft LDP Statement that there is a known flood risk at the site due to surface water run-off where there is no watercourse available for discharge. Similarly, Welsh Water advised that the local water supply network is at the extremity of its capability and that the existing sewer pipe would need to be replaced as a protective measure.

Redrow claims that there is no groundwater problem. Why then has Redrow set the finished floor levels of the houses 1 metre above existing low points? To deal with accepted surface water run-off the Company propose a permanent infiltration basin but nowhere do they state that this will eradicate the problem. Indeed in their EIA screening statement they suggest it would leave the village in no worse position that it is at present. The building of 62 houses of land within the Heol Faen Valley will increase surface water run-off significantly. In our view, even with an infiltration basin, this will only serve to exacerbate an already existing problem. The need to provide such a facility merely adds weight to our opinion that the site is unsuitable to accommodate the development.

To cater for sewerage outflow Redrow propose new pipework and a pumping station that will discharge into the existing sewer crossing the site. How can this sit comfortably with Welsh Water's recent statements that the existing system is over-loaded and that additional housing on this scale would require a larger diameter sewer and improvements to the village pumping station and attenuation tank? With a 40% increase in sewerage outflow the inevitable increase in raw sewerage spillage into Colwinston Brook and onto the highway would be a serious health risk.

Welsh Water also confirmed that the Cowbridge Waste Water Treatment Works has limited capacity to accommodate any new development without further improvements and together with improvements to the village pumping station, attenuation tank and a larger replacement outflow pipe the cost would run into millions of pounds.

These problems arising from the proposed development would be contrary to local planning objectives in relation to both flooding and pollution risks.

Water supplies at Colwinston are already affected during peak summer periods leading to water pressure being reduced and Welsh Water has advised that the Vale of Glamorgan is an area forecast as having a shortfall in supply from around 2020. The building of an additional 62 houses would only make matters worse.

The developer has yet to prove that the scheme will not disrupt the natural environment, is safe and aligns with UDP policies relating to public utilities.

Agricultural Land Quality and Usage

The proposed development will occupy some 2.55 ha. of good quality agricultural land and, as mentioned earlier, this a serious concern both locally and more generally for the Welsh Government. The Agricultural Land Classification Survey Report submitted on behalf of Redrow shows that 84% of the land comprises Grade 2 and 3a being part of the best and most versatile agricultural land. Policy ENV2 and on-going PPW seek to protect grades 1, 2 and 3a from development unless exceptionally there is an overriding need for the development. Clearly the developer has failed to prove an "overriding need" (other than Redrow's financial gain) and nothing in PPW or TAN 6 would support the developer's implication that a mix of grades 2 and 3a land on the same site should diminish its agricultural value when considering a development proposal.

For many years the land has been used as a "foaling and rearing" paddock for local horses and it provides 2 sustainable hay crops each year. The land could equally revert to crops or grazing for sheep and cattle. Current policy states that the loss of open space and paddocks as a local amenity would be unacceptable. Nor would it sit well with the local planning objective to use land effectively and efficiently and to promote the sustainable use and management of natural resources.

Biodiversity

A key principle of planning for nature conservation is for a proposed development to provide a net benefit for biodiversity conservation. In this respect the development proposals are vague and uninspiring. Any application to develop this site for housing must take into account the valuing, promoting, sustaining and protection of the natural environment for future generations and these aspirations must always be the key factor in determining how well the LDP achieves its aims regarding biodiversity etc

This grassland site provides a habitat for birds, butterflies and many wild animals (including a family of stoats) and it is a hunting ground for a pair of breeding red kites and bats from two nearby important roosts. These two latter species are protected under the Wildlife Protection Act and it is an offence to kill or injure them or to disturb their nests and roosts. The Local Biodiversity Action Plan produced by the Vale of Glamorgan Biodiversity Partnership, with a target of 2014, has a number of objectives including "to protect, maintain and increase the extent of grassland and farmland habitats" The designed layout, dominated by the housing development, does not inspire confidence that the long-term retention and enhancement of any areas of ecological interest will be achieved.

Education

St David's Church in Wales Primary School has a maximum capacity of 161 places with a spare capacity of just 27 places. A development of 62 houses could give rise to educating anything up to 100 children of varying ages. As there is no extra land available to provide additional accommodation, it would have to be within the school site. Existing land, however, is extremely limited and any expansion would lead to an unacceptable loss of recreational and amenity space and overcrowding of classrooms to cope with the expected increase in demand for school places. This would contravene Vale of Glamorgan Council policy which seeks to ensure that new housing development does not impose undue pressure on schools.

Tourism

Much is made of the need to promote tourism and leisure within the Vale while protecting existing natural and built environmental assets. Other than Barry Island and possibly Penarth seafront, tourism is based mainly on the Heritage Coast and surrounding countryside. Colwinston is a Conservation village set in a rural location a short distance from the historic market town of Cowbridge and forms part of the Valeways Heritage Millennium Trail. As such the Community Council has seen an increasing number of visitors both as individuals and as groups of walkers and cyclists. It is therefore difficult to understand how building a housing estate of 62 houses in the village, immediately adjoining the Conservation Area and a rural public footpath running down its eastern boundary, will attract further visitors and achieve any Policy objectives regarding tourism.

Other Material Considerations

The Applicant Company's Design and Access Statement makes a case for 'other material considerations' including the argument that the Council's UDP is now out of date.

Planning Policy Wales (Edition 5, November 2012) advises that where development plan policies are outdated in the determination of individual applications, local planning authorities should give them decreasing weight in favour of other material considerations, such as national planning policy, it is for the decision-maker to determine whether policies in the adopted Unitary Development Plan are out of date or have been superseded by other material

considerations and this should be done in the light of the presumption in favour of sustainable development.

Redrow has presented the Local Planning Authority with a speculative and premature application. Clearly the Unitary Development Plan remains in force and Colwinston Community Council believes the democratic process relating to adoption procedures of the Local Development Plan should not be compromised by granting planning permission for a development with suspect sustainability credentials.

Conclusions and Recommendations

Colwinston Community Council considers the proposed development unacceptable as it breaches planning criteria for building in a rural (and Conservation) areas and does not meet sustainable objectives set out in PPW (5) 2012 UDP or the emerging Draft LDP Policies and Objectives. The site is unsustainable and the proposal "unsound" as it is not based on a robust and credible evidence base in relation to physical constraints and a lack of adequate community infrastructure. The project would transform Colwinston from a peaceful rural Conservation village into a vast commuter hub for Cardiff, Swansea and elsewhere.

We do however fully recognise the need for a number of mainly affordable houses that could be accommodated by normal infill and use of a smaller alternative site as mentioned earlier in the Representation and listed in the Alternative Site Register at reference ASN 15.

The Local Planning Authority's vision for the Vale of Glamorgan imposes a requirement to provide developments of exceptional design and quality in a sustainable environment. In this case, there is no clear and transparent evidential basis to conclude that this objective has been fulfilled. Redrow's proposal conflicts with the Development Plan and for this reason, and the detailed arguments set out in this Representation, the Council would strongly recommend that planning permission for this application be refused.

Jane Motte

Clerk to Colwinston Community Council

COLWINSTON COMMUNITY COUNCIL

Vale of Glamorgan Local Development Plan 2011 – 2026 Deposit Plan

Preface

Colwinston Community Council has given detailed consideration to the above proposed Plan and the observations set out below also take into account views and representations made by individual residents and those expressed at well-attended village meetings held on 21 October and 26 November 2013.

These observations consist of objections to the proposed development MG 2 (38) and an assessment of the Sustainability Appraisal regarding that site where we consider the scoring to be flawed both in terms of the failure to consider pertinent issues and the weight attached to a particular matter.

Background

Colwinston is a small mainly agricultural village of some 155 dwellings granted Conservation Area status in 1970 and including a Site of Importance for Nature Conservation (SINC 147) within its boundary. It also forms part of the main route of the Valeways Heritage Millennium Trail. The Conservation Area Appraisal and Management Plan (CAAMP) 2009 recommends resisting any development applications for change on the edge of the Conservation Area that would have a detrimental effect on the area's setting. The road system comprises narrow lanes where two-way traffic is a problem in many places within the village and utility services are working to capacity. Indeed the drainage and sewerage services are failing and there is no mains gas supply. There is currently no public transport system, no village shop or a public telephone box and mobile signals are very poor to non-existent.

The proposed site MG 2 (38) is located on prime grade 2/3 agricultural land directly behind St David's Church in Wales and immediately adjacent to the Conservation Area. Any large-scale development (in this case 65 houses) would contravene many existing planning laws and policy guidance for rural settlements and Policy and Sustainability Objectives within the LDP itself.

Drainage and Sewerage

The village is set on a limestone escarpment which forms a watershed falling away from 90m asl. on the northern boundary to 45m asl. to the south. Natural drainage is via an underground (sometimes surface) watercourse through the Heol Faen Valley, under

Beech Park, and joining Colwinston Brook on the southern outskirts along which there is sited the Village Sewerage Pumping Station and Attenuation Tank.

After heavy and prolonged rain during each winter of recent years the land along Heol Faen valley becomes saturated, the water table rises and a surface stream appears. This flows south towards the head of Beech Park where it enters a drainpipe system running underground to Church Lane where it joins the outflow from the Vines attenuation tank. We understand that an inch of rain falling on this area of saturated land represents some 7.5 million gallons of water weighing 32,000 tons! When this flow overwhelms the drains it backs up behind Beech Park causing a large pond to form and flooding which overflows into the sewerage system at Quarry House. This in turn overloads the Pumping Station and Attenuation Tank with the result that sieved sewage discharges towards Colwinston Brook via a gully alongside the road which then becomes an open sewer. When the sewerage overflow combines with the surface water run-off the bridge area of the brook floods and makes the road impassable. The Brook itself creates a wide flood plain cum swamp in adverse weather conditions inhibiting the free-flow of sewage causing flooding back to the Pumping Station. All this creates a serious health risk for long periods after flooding has abated and from time to time flood damage to dwellings in Beech Park and beyond. Photographs and narrative are attached as an Appendix illustrating the history of this problem.

The Local Planning Authority and Welsh Water are well aware of this continuing problem and the Vale Council's own Drainage Engineers confirm in the LDP Statement that there is a known flood risk here due to surface water run off where there is no watercourse available for discharge. The building of 65 houses over 7 acres of land within the Heol Faen Valley (even with the use of small garden soakaways - if feasible) will significantly reduce the amount of land capable of absorbing rainfall. This in turn will increase the amount of surface water run-off and exacerbate an already existing problem as described above.

Similarly Welsh Water advise in the LDP Statement that the local water supply network is at the extremity of its capability and that the existing sewer pipe would need to be widened as a protective measure. This may also be the case with the 3 inch sewage outflow pipe from the village which is plastic from the fields behind Hen Cartref onwards to Cowbridge and prone to splitting under pressure. Welsh Water confirm that the Cowbridge Waste Water Treatment Works has limited capacity to accommodate any new development without further improvements and yet there are nearly 700 new houses being proposed in the Cowbridge area. The village sewerage pumping station and attenuation tank would also need to be improved and the cost of all these improvements would run into millions of pounds!

All these problems arising from the proposed development would be quite contrary to LPD Objective 2 and Policy MD 1 (Location of New Development) in avoiding areas

of flood risk and Policy MD 8 (Environmental Protection) in relation to both flooding and pollution risks.

Water Supplies

This is another problem of which Welsh Water are aware in that water supplies are already affected during peak summer periods leading to water pressure being reduced. In terms of delivery and implementation of the LDP Welsh Water advise that the Vale is an area forecast as having a shortfall in supply from around 2020! Again the building of an additional and unnecessary 65 houses would only make matters worse.

Highways and Traffic

The previous bus service was completely inadequate (3 buses a day all outside rush hours) and now it has been withdrawn completely from 20 July 2013. Almost every family therefore has at least one car if not two. Employment opportunities in the village are minimal and apart from the primary school, pub, church and village hall, all other services and facilities are between 5 to 8 kilometres away. This will mean that perhaps 100 plus additional cars will make several hundred journeys a day out of the village and back. This would completely go against LDP Objectives 2 and 3 and Policy SP 7 in relation to reducing the need to travel and Policy MD 3 regarding the need to minimise the causes of climate change and incorporate renewable and low carbon energy features.

There is also the question of the site being adjacent to the school where there are major traffic problems morning and evenings such that an unofficial one-way system operates anti-clockwise round the village. Cars turning right out of the site to gain access to the A48 will be travelling against the flow. This raises some important road safety issues in relation to site access directly next to the school and the huge increase in traffic flow, particularly during the morning and evening rush hours, and will create an unacceptable accident risk for children, parents and drivers alike. Policy MD 3 (9) states that new developments will be permitted only where “they will have no unacceptable impact on highway safety and would not cause or exacerbate existing traffic congestion”.

The Highways Engineers are clearly aware of all these problems from their comments in the LDP Statement and would need to think about widening the village lanes that are only 1.8 metres wide in some places and without pavements for pedestrians. In addition the junction onto the A48 at the top of Crack Hill (the nearest access to the proposed site) will need be improved. For instance the designated right turn lane into the village is already too short for existing traffic and without being extended will leave some vehicles backing up into the overtaking lane up the hill. It will inevitably lead to an accident at some stage! At the same time there is no slip road off the west bound road at this junction where traffic travelling at 60mph suddenly slows to 10-15mph when a

car turns left into the village. While most traffic will use the Crack Hill junction for access to and from the village the increased number of cars will inevitably mean more use of the lane leading out to the junction with the A48 at Twmpath. This has no slip road from the east and a blind dip in the A48 to the immediate west. There have already been serious accidents at this junction. None of this fits in with the main objective of Policy MD 3 (8)!

Education

St David's Church in Wales Primary School has a maximum capacity of 161 places where the current take up is 134 leaving spare capacity of just 27 places. A development of 65 houses could give rise to anything up to 100 children of varying ages to educate. While the Educational Facilities Background Paper recognises that no extra land is available for expansion LDP Policy MG 6 proposes to expand or improve the school within the existing school site. However existing land is extremely limited and any expansion would lead to an unacceptable loss of recreational and amenity space and/or overcrowding of classrooms to cope with the expected huge increase in school numbers. This would contravene LDP Objective 5 in that it seeks to ensure that new housing development does not impose undue pressure on schools.

Location and Conservation

As mentioned earlier Colwinston has Conservation Area status awarded because of its landscape setting and rural location providing a wealth of Listed, County Treasure and Positive buildings of architectural merit. The Conservation Area Appraisal and Management Plan (CAAMP) 2009 recommends resisting any development applications for change on the edges of the Conservation Area which would have a detrimental effect on the area's setting. It also recommends that any development respects the important views within, into and from the Conservation Area and that the development of open areas that contribute to its character should be opposed.

Putting to one side the specific Conservation Area issues there are more general sections of Welsh Planning Policy that are there to protect minor rural settlements such as Colwinston from inappropriate development. For instance Policy HOUS 2 refers to "small-scale developments which constitute 'rounding off' of boundaries and being no more than 5 dwellings". Similarly Policy HOUS 8 sets out a series of criteria to be met that include :-

- i) scale, form and character of the development as being sympathetic to the environs of the site
- ii) there is no unacceptable effect on the amenity and character of existing or neighbouring environments of noise, traffic congestion, parking or visual intrusion
- iii) the proposal does not have an unacceptable impact on good quality agricultural land, on areas of attractive landscape....

- vi) adequate community and utility services exist, are reasonably accessible or can be readily and economically provided

The LDP itself within its strategy, objectives and specific housing policy purports to protect such rural villages from inappropriate and out of scale development. In particular Policy MD 6 (Development Within Minor Rural Settlements) states in part that new development will only be permitted where :-

- The proposal is of a scale, form, layout and character that is sympathetic to and respects its immediate setting and the wider surroundings
- The proposal would not either singularly or cumulatively have an unacceptable impact on the character and/or appearance of the settlement
- The proposal would not represent a visual intrusion into countryside or the loss of important open space(s) that contribute to local amenity, character or distinctiveness
- The proposal would not result in the loss of natural or built features that individually or cumulatively contribute to the character of the settlement or its setting
- It makes appropriate provision for community infrastructure to meet the needs of future occupiers.

The proposed development of 65 houses is located immediately adjacent to the Conservation Area and is in direct line of sight from the rear of properties on the north side of Hen Cartref, Yew Tree Close and the road leading into the Conservation Area. It is also the case that many houses overlooking the site will have their view of open fields either outwards from, or inwards to, the Conservation Area either partially or totally blocked. As such it does not comply with the policies and recommendations of the CAAMP Report.

In addition it does not accord with Policies HOUS 2 and HOUS 8 as it is more than the 5 dwellings recommended under the first and breaches 4 of the main criteria under the second. It also contravenes the LDP's own policies (MD 2, 3 and 11) and in particular those enshrined in Policy MD 6. Housing stock within the village would increase by nearly 42%, car numbers by up to 100 or more and inhabitants by perhaps 200 or so. We consider this amounts to a development grossly out of scale with the existing character of the Conservation village and is completely unsustainable given that utility services are at capacity or worse, there is no public transport, no mains gas, no shop and community services limited or non-existent. To rectify this situation would be at a cost out of all proportion to the viability of the proposed development.

Housing Need

It is frankly difficult to understand how the LDP's projection of an increase in population over the planning period of approximately 6000 translates into a housing need of nearly 11000. LDP Policy SP 3 (Residential Requirement) states that

household projections for 2011 will not be available until the end of the year (only a matter of weeks away) and thus housing need will be based on those figures produced in 2008. It does not seem much of a strategy to use out-dated forecasts where much has changed over the last five years (including the demise of the St Athan Training Centre and other large employment projects) when the latest figures will be available shortly. Most commentators expect a significant reduction in the household estimates and so it calls into question the need for the large number of out of scale developments on greenfield sites in the Rural Vale like the one proposed for Colwinston.

Housing policy under the LDP directs new development to sustainable locations to support the needs of the local community (LDP Objective 7 and Policies MD 1 and 2) but since there are no employment opportunities in the village local housing need is minimal. LDP Policy MD 6 (Development Within Minor Rural Settlements) states that new development should “comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing”. LDP Policy MD 11 (Affordable Housing in Rural Areas) states “any affordable housing scheme will need to be of a scale proportionate to the size of the existing settlement”. A small number of affordable houses (perhaps 15 or so) can be built over the planning period by use of appropriate infill and adoption of a smaller alternative site that had been rejected at the “candidate” stage two years ago in favour of the much larger development now proposed.

Biodiversity and Land Use

The proposed development will destroy some 7 acres of good quality agricultural land that, up until its inclusion as a candidate site for the LDP, was used as a “foaling and rearing” paddock for local horses. The land could equally revert to grazing for sheep and cattle and it also provides 2 substantial hay crops each year. The loss of open space and paddocks as a local amenity would “not be acceptable” according to paragraph 7.31 of LDP Policy MD 6 and it does not sit well with LDP Objective 10 “to use land effectively and efficiently and to promote the sustainable use and management of natural resources”. These Policy anomalies in relation to land use are obviously recognised since we are told in the LDP Statement that a site specific Agricultural Land Survey will be required.

This grassland provides a habitat for birds, butterflies and many wild animals (including a family of stoats) and it is a hunting ground for a pair of breeding red kites and bats from two nearby important roosts. These two latter species are protected under the Wildlife Protection Act and it is an offence to kill or injure them or to disturb their nests and roosts. The Local Biodiversity Action Plan produced by the Vale of Glamorgan Biodiversity Partnership, with a target date of 2014, has a number of objectives including to protect, maintain and increase the extent of grassland and farmland habitats which have been incorporated into LDP Policy MD 10 (Promoting Biodiversity).

Tourism

Much is made in the LDP Statement (Objectives 4, 9 and 10 and Policy SP 11) about the need to promote tourism and leisure within the Vale while protecting existing natural and built environmental assets. Other than Barry Island and possibly Penarth seafront, tourism is based mainly on the Heritage Coast and surrounding countryside.

Colwinston is a Conservation village set in a rural location a short distance from the historic market town of Cowbridge and forms part of the Valeways Heritage Millennium Trail. As such we see an increasing number of visitors both as individuals and as groups of walkers and cyclists. It is therefore not easy to see how building a housing estate of 65 houses in the middle of our village will attract further visitors and achieve any of the Policy objectives regarding tourism.

Sustainability Objectives

Under Welsh Government Planning Policy all new developments need to satisfy “sustainability” criteria before inclusion within the LDP and these are set out in the Sustainability Appraisal Report. We would comment on each objective below and provide our own ‘score’ in relation to its ‘effect’ with regard to site MG 2 (38).

Objective 1 – To provide the opportunity for people to meet their housing needs

While any housing development will meet someone’s housing need the immediate local need is minimal. The Local Housing Market Assessment Study 2010 referred to shows an annual requirement of 1558 houses for the whole region of which only 45 were located in the Rural Vale (see table 6.13). To therefore say the site is in an area where a significant need has been identified is incorrect and extremely misleading.

Without employment opportunities in the village there is no reason for such a development that would turn Colwinston into a commuter suburb for Cardiff, Swansea and elsewhere.

Effect - -

Objective 2 – To maintain, promote and enhance the range of local facilities

The development would do none of these things nor provide potential enhancement to the school. Without additional land to expand any expansion within the existing school site would significantly and unacceptably reduce the amount of recreational and amenity space and/or create overcrowding in the classrooms. We also see no possibility for it to enhance any other community facility.

Effect -

Objective 3 – To maintain and improve access for all

The school, community hall and park are the only facilities in the village and all other services are some 5-8 kilometres away. Since there is no village bus service and the nearest public transport over a kilometre walk distant they can only be reached by car.

Effect - -

Objective 4 – Reduce the causes of deprivation

None of the criteria used under this objective would be met and Colwinston is not ranked low in the Index of Welsh Multiple Deprivation.

Effect 0

Objective 5 – To maintain, protect and enhance community spirit

While the site would not lead to a coalescence of settlements it might well reduce the amount of recreational and amenity space in the school due to necessary expansion and turn a small and integrated village into a commuter hub for elsewhere.

Effect -

Objective 6 – to minimise the causes and manage the effects of climate change

As demonstrated in more detail elsewhere in this Representation the site is not sustainable.

Other than the school all main services are some 5-8 kilometres away and all working residents would need to commute so there would be a huge increase in car journeys of 200 or so in and out of the village every day. This potential increase in traffic flow of over 40% is recognised by the Vale Council in its own site assessment within the Sustainability Appraisal Report.

The site is prone to flooding with a proven history acknowledged by the Vale Council's own Drainage Engineers in the LDP Statement regarding site constraints. To state otherwise is a gross inaccuracy and illustrates a lack of factual information!

Effect - -

Objective 7 – To minimise waste

Clearly it is recognised that this will not be the case since the development would increase the size of the village by over 40% which, on any comparative basis, is very significant indeed.

Effect -

Objective 8 – To use land effectively and efficiently

This objective concerns sites that are brownfield and/or involves the beneficial re-use of existing buildings whereas ours is **greenfield** good quality agricultural land. It is a matter of some concern that the Council seems to pay scant regard to the vital role of agriculture and the retention of agricultural land in contributing to the sustainability of

domestic food requirements. This would appear to go against existing planning policy in protecting such land and in particular LDP Objective 10 “to promote the sustainable use and management of natural resources”.

The site also lies immediately adjacent to the Conservation area and we note the assessment recognises this will have a detrimental effect on that area. What we do not understand is why in that case during the Candidate Site Assessment Process land opposite the school was rejected on the grounds “it would have an adverse impact on the character and setting of Colwinston Conservation Area”.

Effect -

Objective 9 - To protect and enhance the built and natural environment

Again the site is immediately adjacent to the Conservation area and will spoil the character and open nature of the village. The Vale Council concedes the site will impact on the landscape and biodiversity of the area but we do not accept there is any mitigation in “gently sloping land” and at least one hedgerow across the middle of the site will be destroyed.

We also note that the Glamorgan Gwent Archaeological Trust have advised in the LDP Statement that an archaeological evaluation of the site will be required prior to any planning application.

Effect -

Objective 10 – To provide a high quality environment within all new developments

The high quality environment already exists. It is the proposed development that has the potential to degrade that situation. The justification for a positive score here is dubious since merely being next to a Conservation Area in no way suggests that any development would preserve or enhance that area.

Effect 0

Objective 11 – To protect, enhance and promote the quality and character of the Vale of Glamorgan’s culture and heritage

As with 9 and 10 above this Objective cannot possibly be achieved and it will in fact have a detrimental effect on the village and Conservation Area.

Effect - -

Objective 12 – To reduce the need to travel and enable the use of more sustainable modes of transport

The village has no bus service, no employment opportunities and no main services other than the school. There is an hourly bus service on the A48 to Bridgend and Cowbridge but the nearest bus stop is over the 1200m maximum threshold identified in Table 1 of the Sustainable Settlements Appraisal Review Nov. 2011. Thus almost every

household has at least one or more cars in order to reach their places of work and most services and facilities.

It must be acknowledged that one of the fundamental tenets of Welsh Government Planning Policy is to minimise the need to travel and to increase accessibility by modes of transport other than the private car. This is endorsed in the LDP Objectives 2 and 3 and Policy SP 7 (Transportation) and the site allocation of 65 houses producing a 100 plus additional cars would directly conflict with these policies.

Effect - -

Objective 13 – To provide for a diverse and wide range of job opportunities

Since there are no job opportunities and the site is for a housing development this objective is irrelevant.

Effect 0

Objective 14 – To maintain and enhance the viability of the Vale’s town, district and local centres

The assessment confirms there would be no impact on Cowbridge where an additional 561 houses are already proposed within the LDP plan period.

Effect 0

Objective 15 – To promote appropriate tourism

As mentioned earlier in the Representation putting a modern housing estate of 65 houses in the middle of a Conservation village, itself part of the Valeways Heritage Millenium Trail, is hardly conducive to attracting more tourists.

Effect -

SA Effects Summary

The above objective assessment gave no positive scores; 4 neutral scores; 6 negative scores and 5 double negative scores.

SA Summary Comments

We think that in the original assessment too much emphasis was placed on the fact there was a local school in the village without considering its inability to cope with the expected huge increase in numbers or how to expand the school within limited land constraints. In addition too little weight was attached to major issues highlighted in this Representation (or in some cases ignored or based on factually incorrect information) in relation to :- **Sustainability - Highways - Impact on Conservation Area Infrastructure - Physical Constraints**

Many of these problems are now recognised by the Vale Council and listed in the Housing Allocations Appendix 5 to the LDP Statement in their comments concerning site MG 2 (38). We consider that had the original assessment been scored correctly

during the Candidate Site Assessment Process it would not have been included in the Deposit LDP in the first place.

Conclusions and Recommendations

As the Community Council we find the proposed development unacceptable in breaching many of the planning criteria for building in a rural (and Conservation) area and not meeting many of the sustainable objectives set out in PPW (5) 2012 and the Deposit LDP Policies and Objectives. The site is unsustainable and the proposal “unsound” in so far as it is not based on a robust and credible evidence base. It would transform Colwinston from a peaceful rural Conservation village into merely a commuter hub for Cardiff, Swansea and elsewhere.

As an observation we also note that planning application 2013/00602/OUT has been withdrawn due to serious concerns and objections expressed by the Vale Council, and a number of consultees, regarding the extensive additional infrastructure work necessary in attempting to make the development sustainable. This proposed development of 45 houses was situated next door to site MG 2 (38) and we would therefore question the planning rationale behind a proposal for 65 houses in almost the same location!

We do however recognise the need for a limited number of mainly affordable houses that could be accommodated as normal infill and use of a smaller alternative site as mentioned earlier in the Representation.

The Community Council thus recommends that site MG 2 (38) be deleted from the Deposit LDP.

Submitted for and on behalf of Colwinston Community Council by:-

Jane Motte
Clerk to the Council

Appendix to Colwinston Community Council Representation

Proposed Development Site MG 2 (38)

Prime Grade 2/3 agricultural land

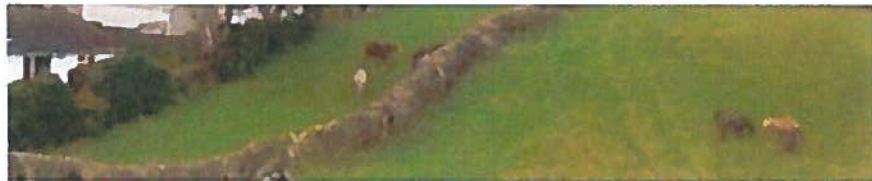
The site is good quality agricultural land yielding crops of hay of high quality, and is currently in use for horse foaling. It has recently been used for sheep rearing. It has also been used for cattle rearing in the further past.

Beech Park
(aerial view in dry weather)



South West end of MG 2 (38) adjoining Beech Park (aerial view during hay harvest)

Beech
Park



South West end of MG 2 (38) adjoining Beech Park (view from south)

Drainage

Runoff coming down the Heol Faen valley backs up against earth barriers at two field boundaries before entering a system of drains in Beech Park. Each winter in recent years the volume getting beyond the barriers has been too much for the drains beyond MG (2) 38.





The Boundary between MG (2) 38 and Beech Park

Looking in the Heol Faen direction (North Eastward) from the gardens of 6, 7 and 8 Beech Park it is possible in daylight to anticipate when the volume of water backed up against the field boundary will be too great for the earth barrier. This is not possible at night.



Drains for runoff in Beech Park

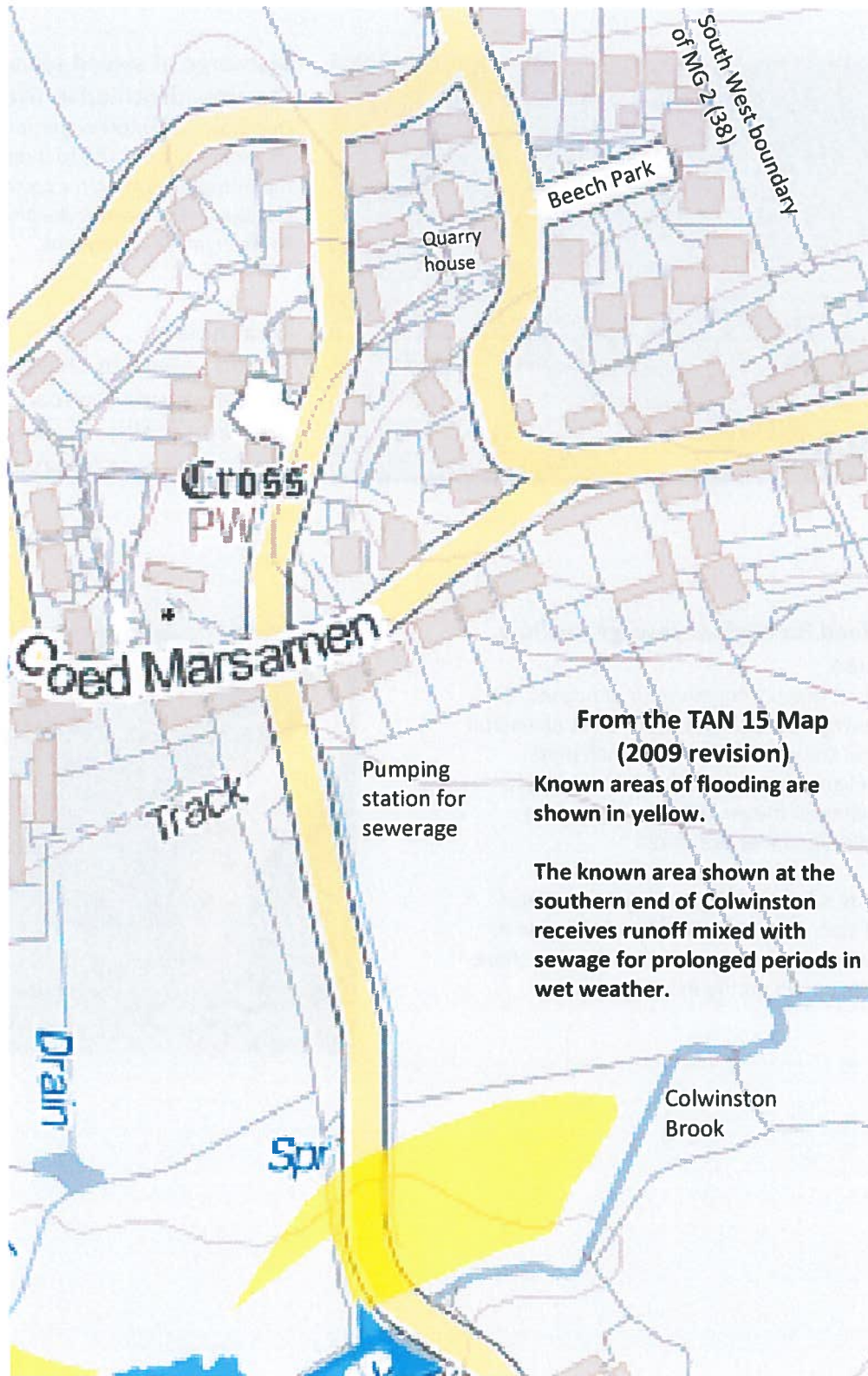
The drains which take the runoff entering Beech Park do not have adequate pipe diameters for the volume of water that they have to cope with. There is also too much reliance on one or two which abut the boundary with MG 38 (2)

Flooding down drives and the roadway in Beech Park

There being no watercourse for discharge people's drives and the road take the water down to Quarry House.

This adds to runoff water from developments lower down in Colwinston. An attenuation tank provided at the southern end was provided with nearby developments in mind, and certainly fails to cope with what comes down from MG (2) 38.







Discharge of sieved sewage into the area identified in TAN 15

Overflows of runoff water into the sewerage system add to overload on the Pumping Station for conveying sewage to Llysworney despite there being an attenuation tank.

Health risks

Sieved sewage discharges into a gully alongside the road and creates a health risk as well as making the road impassable

Need for a wider sewage outflow pipe

With the existing number of houses, the sewage outflow pipe between Colwinston and Llysworney is a three inch pipe. Reliance on a pipe with such a narrow diameter means the pipe is prone to splitting under pressure.

This is the basis for advice from Welsh Water. Recent builds have been told to rely on septic tanks. Even if they do there is overload on the existing system..



Appendix 3 – Consultant’s Reports Prepared On Behalf of Colwinston Community Council Assessing Redrow’s Proposed Housing Development At Colwinston – 2014/0242/FUL

Summary

Colwinston Community Council commissioned five professional consultants to review the documentary evidence base supporting Redrow Homes’ planning application 2014/0242/FUL. The reports of the five consultants are brought together in this one document to aid the presentation of evidence. The independent assessments cast serious doubt on the sustainability of the housing development in terms of strategic planning policy, conservation legislation and development management criteria.

The present evidence base presented by Redrow Homes does not indicate that the development is in conformity with the existing or emerging Development Plan or with Planning Policy Guidance Wales. Nor does Redrow’s evidence demonstrate that there are material considerations of such magnitude that should outweigh the Development Plan presumption against development.

Plan R Ltd (Planning Consultancy) judges that any decision by the Vale of Glamorgan Council to allow development would be premature in advance of an assessment by an independent Planning Inspector in relation to the soundness of the emerging LDP housing strategy. The planning consultancy also calls on the Council to re-examine its housing demand figures in the light of recently published housing projections and its housing supply side in relation to recent planning consents.

Page and Dean Consulting (Conservation Architects) states that the proposed development conflicts with Welsh Government's policy objective of preserving or enhancing the character and appearance of a Conservation Area and/ or its setting. The Council is under a statutory obligation under Welsh Office Circular 61/96 to refuse applications that fail to preserve or enhance the Colwinston Conservation Area. The consultancy also clearly shows how the housing scheme conflicts with numerous of Vale of Glamorgan County Council's stated policies, most especially ENV17 - Protection of (the) built and historic environment.

EGIS consultancy (Agricultural Land Quality Consultants) demonstrate the inadequacy of any assessment of the proposed total loss of the best and most versatile agricultural land. The loss of Grade 2 and 3a agricultural land would be irreversible and would conflict with Planning Policy Guidance Wales and the Council’s ENV 2 UDP policy seeking to protect such land.

Traffic and Transport Planning show that the highway data presented is incorrect and that the proposed development will not satisfy either national or local transport policies. It judges that the impact of the development would lead to hazardous and unsafe highway movements in the local area and on the strategic A48.

Hydro GIS Ltd (Land Drainage) express strong reservations over Redrow’s land drainage evidence base showing how it is lacking in much important information. The site clearly floods and the consultants opine that in its current form the Drainage Strategy report should be rejected.

Appendix 3

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PLANNING APPLICATION NO. 2014/0242/FUL

PROPOSAL BY REDROW FOR RESIDENTIAL DEVELOPMENT OF 62 HOUSES AT LAND TO REAR OF ST DAVID'S PRIMARY SCHOOL, COLWINTON

1.00 Redrow's planning application seeks consent for 62 houses on agricultural land in the countryside outside the village settlement boundary. The site is not allocated in the Unitary Development Plan.

2.00 Section 38 of The Planning and Compulsory Purchase Act 2004 requires that the Council determine an application in accordance with the development plan unless material considerations indicate otherwise. In development plan terms, the proposal for a housing estate in the countryside would have to be refused as the only reasonable outcome. The additional question then posed by Section 38 – is 'are there any material considerations that would indicate that the application should be approved'? Redrow consider that the allocation of the site under MG 2 (38) in the Council's Cabinet Draft Local Development Plan is a strong material consideration. The developer also asserts that the lack of a 5 year land supply is also a significant factor that should direct the Council to allowing the development despite it not being allocated in the current development plan.

3.00 Planning Policy Wales indicates that the weight to be given to an emerging draft LDP '*will in general depend on the stage it has reached, but does not simply increase as the plan progresses towards adoption. When conducting the examination, the appointed Inspector is required to consider the soundness of the whole plan in the context of national policy and all other matters which are material to it. Consequently, policies could ultimately be amended or deleted from the plan even though they may not have been the subject of a representation at deposit stage (or be retained despite generating substantial objection)*'.

4.00 Limited weight should be given to the allocation of the site in the Council's draft LDP for reasons including:

- 2014 household population projections from Welsh Government and the latest Barton Willmore guidance note show a significant fall in housing demand throwing into doubt the basis of the housing demand figures on which the site's allocation is predicated;
- objections by Welsh Government (letter to VoG Dec 20 201) to the allocation of sites in rural villages under **B1. Scale and Location of Growth – Flexibility and spatial strategy**. In relation to B1, Welsh Government

argues that this goes to the heart of the soundness of the LDP and comments on the potential weaknesses of an approach to sustainability that allocates large scale housing in villages without adequate services. It seems strange indeed that in terms of sustainability, the LDP proposes less housing in Barry and Penarth and more in rural villages.

- Welsh Government asserts (**C4. Best and Most Versatile Agricultural Land**) that insufficient evidence is provided in the plan as to the need for the use of the best and most versatile agricultural land. The site contains 84 per cent of high grade agricultural land.
- Welsh Government point to inadequate sewage infrastructure to support housing delivery. While Redrow does not consider the sewage issue to be a barrier to development it is clear that the Colwinston Pumping Station is already at capacity and the age and the ability of the system to cater for a 40 percent increase is questionable. For example the age and quality of the pumps and the 50 mm pipe taking effluent to Llysworney and onto Cowbridge is considered inadequate by Welsh Water operatives we spoke to on site. It is very unclear how the sewage constraints/potential increased liabilities are to be met.

5.00 It would therefore be unsound to grant a planning consent based on a possible allocation in a LDP when there are significant objections of substance in relation to housing allocations in rural areas and some way to go before an Inspector assesses whether the LDP is even sound.

6.00 Planning Policy Wales's guidance states '*Questions of prematurity may arise where an LDP is in preparation but the plan has not yet been adopted. In these circumstances refusing planning permission on grounds of prematurity may be justifiable in respect of development proposals which are individually so substantial, or whose cumulative effect would be so significant, that to grant permission would predetermine decisions about the scale, location or phasing of new development which ought properly to be taken in the LDP context. Refusal will therefore not usually be justified except in cases where a development proposal goes to the heart of a plan. This requires careful judgement. A refusal might be justifiable where a proposal would have a significant impact on an important settlement, or on a substantial area, with an identifiable character, but is rarely justifiable if a development proposal is likely to impact upon only a small area.*'

7.00 As indicated above, Welsh Government has significant concerns over the spatial distribution of new houses and again as indicated above, housing demand projections have fallen. Added to this, the Community Council and local residents have expressed strong objections to the allocation of the site. To allow development in advance of an opportunity for the spatial distribution policy in the western vale plus the allocation of a major site for 65 houses to be debated and analysed at an Examination In Public would not pass the test of natural justice and fairness. As part of such an examination, the Community Council would want to seriously challenge the scale of increase of housing proposed. The draft LDP allocation of 65 houses would be an increase of 42 per cent of the village's housing. The proposal for a small rural village to see

such a dramatic increase through a planning application rather than the LDP process appears totally unbalanced. The Community Council councillors, as community leaders and place shapers are not against new housing. Rather they favour smaller scale organic growth appropriate to the scale and service provision of the village. Development of the scale proposed with limited affordable housing provision would do little for meeting local needs. The Community Council through the LDP process would want to be part of a mature discussion that considered housing growth in the range of 15 -20 houses in infill locations such as ASN 15 opposite St David's School. Growth of the village by some 10 -15 percent over the plan period would much more closely match service provision, infrastructure capacity and the historic growth of the village.

8.00 Housing land supply in the Vale of Glamorgan is assumed to have improved since the October 2013 Joint Housing Land Availability Study. In its 2013 JHLAS the land supply was 4.42 years. This is not significantly lower than the required 5 year figure and in the meantime the Council has granted large scale residential applications including 115 dwellings at Plasnewydd Farm Llantwit Major. This plus the decreased demand for housing as demonstrated by the latest Barton Willmore figures shows that there is no overriding imperative for the large scale Redrow site to be approved.

9.00 Notwithstanding planning policy considerations, development must meet normal development management criteria and statutory advice. As is demonstrated by consultant advice procured by the Community Council in relation to highways, conservation area, flooding and agricultural land quality – the development does not meet the tests laid down in PPG Wales, circular advice in relation to the preservation and enhancement of Conservation Areas and ENV policies in the UDP.

R C Hathaway BSc Hons, Dip TP, MRTPI
On behalf of Colwinston Community Council
April 17 2014

Land to the Rear of St. David's Primary School, Colwinston

Vale of Glamorgan

NGR: SS 94173 75670

Vale of Glamorgan CC Application Reference : 2014/00242/FUL



View of the Site from the north south Public Right of Way stile

A Conservation Response

by Page & Dean Consulting

April 2014



Traditional stone wall and beech hedging

Page *of* Dean Consulting

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Executive Summary

The current Application should be refused because:

- The proposed development conflicts with Welsh Government's policy objective of preserving or enhancing the character and appearance of a Conservation Area and/ or its setting.
- The proposed development conflicts with numerous of Vale of Glamorgan County Council's stated policies, most especially ENV17 - Protection of (the) built and historic environment.
- The proposed development conflicts with Welsh Government's policy regarding the preservation of 'Best and Most Versatile' (BMV) land.

The reasons being:

- The proposed development is too large a scale (compared with other modern developments) within the existing village structure
- It seeks to coalesce Colwinston with housing at Maes-y-Bryn against the previous recommendations of two Planning Inspectors
- It would radically alter the historic east west historic settlement pattern
- It would reduce the rural aspect of the Conservation Area
- It would damage views to/from the Conservation Area
- The form and materials do not relate to the vernacular of the village or the Conservation Area
- It would damage the landscape value of the area
- It would develop valuable agricultural land against Welsh Government Policy

1.0 Introduction

This Response has been prepared as a conservation commentary to Nathaniel Lichfield and Partners' Design and Access Statement which is in turn based on a Heritage Desk Based Assessment by Cotswold Archaeology, Anthony Jellard Associates' Landscape and Visual Assessment and an Agricultural Land Classification Survey by Kernon Countryside Consultants.

Issues of assessing significance/importance, relative values and potential effects are largely subjective with frameworks for analysis attempting to reduce this subjectivity by setting the context wider, referring to a 'pecking order' and applying relativity/numerical analysis.

There has been an increasing use of late of two main 'procedures' to seemingly reduce the impacts to 'setting' within the Historic Environment firstly to 'scope out' effects by deeming them to be beyond 'limits' and, secondly to point out the excellent qualities of an asset but then to refer to the few people able to benefit/enjoy them.

The current Welsh Government planning policy is WAG's Planning Policy Wales, Chapter 6 (Conserving the Historic Environment) which gives guidance on archaeology, ancient monuments, conservation areas and historic parks, gardens and landscapes and which states that:

"Should any proposed development conflict with the policy's objective of preserving or enhancing the character and appearance of a Conservation Area, or its setting, there will be a strong presumption against the grant of planning permission."

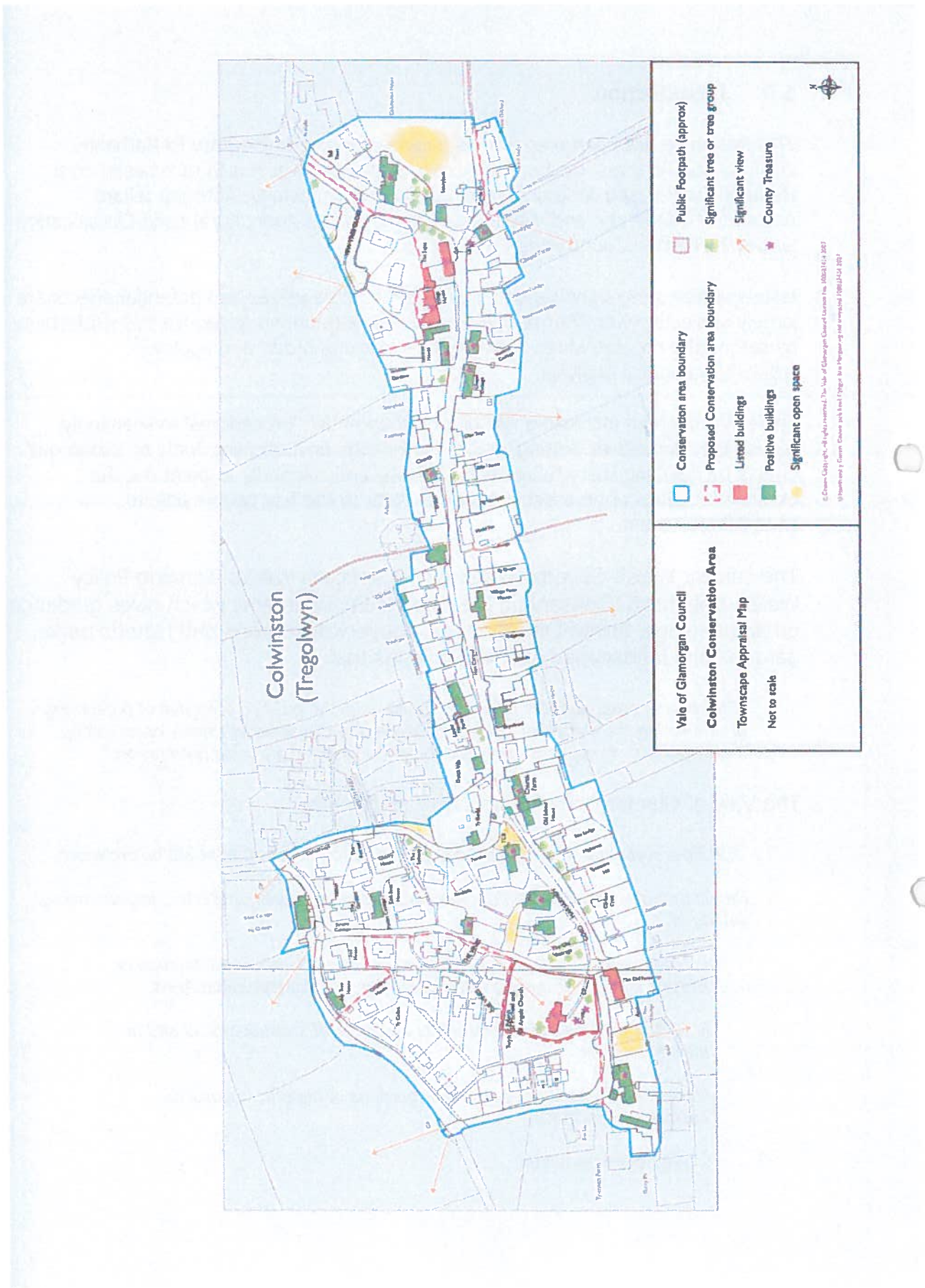
The Vale of Glamorgan's Policy ENV17 states that

'The Environmental qualities of the built and historic environment will be protected.

Development which has a detrimental effect on the special character, appearance or setting of:

- i. A building or group of buildings, structures or site of architectural or historic interest, including Listed buildings and Conservation Areas;*
- ii. Scheduled Ancient Monuments and sites of archaeological and/or historic interest;*
- iii. Designed landscapes, parks or gardens of historic, cultural or aesthetic importance,*

... will not be permitted.



Colwinston's Conservation Area 2009

There are six main areas of concern:-

1.0 Conservation Area - Dilution of Quality

1.1 Planning Policy Framework

To quote from the Conservation Area - Appraisal and Management Plan (CMP) approved on 25 March 2009:

"The Colwinston Conservation Area was designated in October 1970 by the former Glamorgan County Council in recognition of the special architectural and historic interest of the village."

"Having designated the Conservation Area, the local authority has a statutory duty to ensure that the character of the area is preserved or enhanced."

"The Colwinston Conservation Area Appraisal and Management Plan builds upon policy set out by the Welsh Assembly, in Planning Policy Wales, and local policy including the Council's adopted Supplementary Guidance 'Conservation Areas in the Rural Vale' (1999). This document provides a further, firm basis on which applications for development within, and close to the Colwinston Conservation Area can be assessed."

"the Council has a general duty to ensure the preservation and enhancement of the Colwinston Conservation Area in the determination of planning applications";

"It is the quality and interest of an area, rather than that of individual buildings, which is the prime consideration in identifying a Conservation Area."

"It is, however, important that new development in or adjacent to the Conservation Area either preserves or enhances the quality of the area. For this reason, strict controls exist over applications for new development."

(NB Our underlinings throughout).

The CMP indicates a number of key elements of Special Interest including:

- *Small village in a rural setting of open fields;*
- *Prevalence of local lias limestone, sometimes lime-washed, under slate roofs;*
- *Situated on a network of public footpaths and the Valeways Millennium Trail;*
- *Stone boundary walls;*
- *Extensive views across open countryside especially to the south through gaps in the built development;*

It is unclear whether the following Advisory Group has been consulted (as it is not on the Consultees List):

"Dependent upon size of a proposal, an application may also be referred to the Council's Conservation Area Advisory Group, an independent forum which makes recommendations to the Council's Planning Committee regarding a number of issues regarding the management of conservation areas in the Vale of Glamorgan."

But, we suggest perhaps it should.

1.2 Submitted Design and Access Statement

The gist of the Design and Access Statement (DAS) regarding the nature of the CA, and existing building designs in the immediate vicinity of the application site, appears to imply that the CA and the village's quality has already been diluted by an "*extremely varied local residential architecture*" (para 2.12) such that in essence ... what difference will a few more different design motifs (this time in brick) make to the overall ambience of the village ?

Indeed, the lack of considered discussion regarding the CA, its architectural/ historic qualities and the potential impact of such a large scale development in the (largely archaeologically biased) Cotswold Heritage Consultants' Assessment is remarkable.

The inference that two (or more) 'wrongs' can make a right is, we would contend, not the correct stance.

The DAS does however serve to point out that within Colwinston:

"The use of brick is limited but there are instances of its use" (para 2.9)

"New residential sites have been built using materials in keeping with the surroundings, using flat render and black roof tiles" (para 2.11)

"the most common material used in the immediate area is render ... the area consists predominantly of roughcast render mostly painted white" (para 2.13).

The Heritage Desk Based Assessment Summary points to:

"no prehistoric finds within the site boundary. There are three heritage sites recorded within the study area ... no records of Palaeolithic and Mesolithic evidence within the surrounding landscape ... and, no Roman period heritage assets recorded within the site. There are two Roman period assets recorded within the study area ... There is no evidence of early medieval activity within the site or the study area"

"There are seven medieval sites recorded within the study area. There are no post-medieval heritage assets recorded within the site. There are 31 post medieval heritage assets recorded within the study area."

"a low potential for previously unrecorded medieval and post-medieval archaeology to exist within the site, probably as remains of farming or as find spots"

"There are no modern heritage assets recorded within the site. There are 10 modern heritage assets recorded within the study area."

...which we would not disagree with except to point to the Bronze Age Tumulus (technically outside the study area) where Twmpath lane joins the A48 the excavated contents of which are with the British Museum (The Collins Pritchard Collection) and the possibility of an ancient trackway which potentially formed the original route through the village down past the church and on to Twyn Yr Eglwys (beyond which there was a discovery of a set of Bronze Age axe heads on farmland last year). Source Mr Edward H Lewis.

To state, however, that:

"It is concluded that the development would slightly harm the conservation area's setting, through an alteration to its significant rural surroundings and the experience of

the conservation area from a public footpath running north-south into the conservation area will also be affected.

However, development will not harm the key contributors to the conservation area's value, which are its architectural and historic elements."

... is to miss much of the thrust of the CA's importance (c.f. Cotswold Assessment paras 5.6 - 5.10). That is, it is not necessarily the individual/combined buildings' architectural and/or historic merits, but rather the linear settlement pattern, its homogeneity of materials and form (despite modern interruptions), its compactness along the minor ridge line, its rural setting and the views to/from that that are also key contributors.

It is, nevertheless, our view that the CA has been diluted by inappropriate infill overtime along much of Hen Cartref/ Coed Marsarnen, and also at either end by Yew Tree Close, The Vines and Cleavis Lodge/Orchard developments (so much so that the LPA has had to redefine the CA to exclude these areas) and that Beech Park, whilst technically outside the CA also detracts from the CA's quality. The current application, albeit again outside the CA proper, can only serve to dilute the CA's quality still further and should be resisted.

The Redrow proposal for 62 dwellings takes little cognisance of the local architectural vernacular in the choice of materials or colours, although a number of the design motifs are similar in style to some of the newer properties. The Redrow 'Heritage - Arts and Crafts' range is quite limited to the 'English' counties i.e. Marlborough, Henley, Sunningdale etc.

The claim that *'the style could suit almost any location'* (DAS p27 para 6.35) we would contend is probably not so in Colwinston, and clearly does not (as good design should) reflect/ respond to the vernacular of older or modern buildings. Please refer to the 'Photographic Record' attached to this Response for an overview of the village's architecture.

The DAS indicates that the Cambridge is *'a key focal building'* type (p25 para 6.12) yet there are only 8 of these in total (13%) and we estimate from the 'Proposed Street Scene' illustration a 50/50 split totally brick/partially brick and render (c.f. plots 9, 52 and 61 the latter two totally brick). It is only the front of the first example that is mainly render, not so the flank walls or rear elevation.



PLOT 9-
CAMBRIDGE



PLOT 52-
CAMBRIDGE



PLOT 61-
CAMBRIDGE

Approximately 82% of the vertical facades of the 62 dwellings are Ibstock brick (50/50 red/brown multistocks) and 18% of other materials, mostly render. This is almost the direct opposite ratio to the majority of the village and will serve to make the development 'stand out' even more within the landscape. All of the garages are also brick with timber doors and feather-edged timber gables to the front.

Moreover, the proposal indicates all the roofs are brown/grey concrete tiled, and there is not a single instance of a stone wall boundary all being 1.8m high close-boarded fence or brickwork and much of the hard landscaping is brick pavements which again is counter the existing design elements within the village generally (c.f. attached walling photographs).

REDROW HOUSING TYPES - COLWINSTON APPLICATION											
Open Market Housing Types	Beds Nos	Facade Materials		Rear	Side	Side	Brick Elev	Other Elev	Brick Score	Other Score	Roof Tiles
		Front	Brick/Pantile								
Mariborough	5	3	Brick/Pantile	Brick	Brick	Brick	4	0	12	0	Concrete
Henley	4	5	Brick	Brick	Brick	Brick	4	0	20	0	Concrete
Sunningdale	4	8	Brick	Brick	Brick	Brick	4	0	32	0	Concrete
Canterbury	4	2	Brick/Pantile	Brick	Brick	Brick	4	0	8	0	Concrete
Cambridge	4	4	Brick	Brick	Brick	Brick	4	0	16	0	Concrete
Worcester	4	10	Mostly Render	Brick	Some Render/Mostly Brick	Some Render/Mostly Brick	2	2	8	8	Concrete
Stratford	4	1	Brick/Pantile/Timber/Render	Brick	Brick	Brick	3	1	30	10	Concrete
Marlow	4	4	Mostly Render	Brick	Some Render/Mostly Brick	Some Render/Mostly Brick	2	2	2	2	Concrete
Warwick	3	9	50% Render/50% Brick	Brick	Some Render/Mostly Brick	Some Render/Mostly Brick	3	1	12	4	Concrete
			Brick/Some Timber	Brick	Brick	Brick	3	1	27	9	Concrete
Affordable Housing											
Types											
5.3.2	3	1	Brick	Brick	Brick	Brick	4	0	4	0	Concrete
4.2.2	2	3	Brick	Brick	Brick	Brick	4	0	12	0	Concrete
E	2	6	Brick	Brick	Brick	Brick	4	0	24	0	Concrete
1B	1	2	Mostly Render	Brick	Some Render/Mostly Brick	Some Render/Mostly Brick	2	2	4	4	Concrete
Total		62 dwellings							211	37	
Garages									82%	18%	100%
Double-Single Type 2			Mostly timber	Brick	Brick	Brick			Brick Mostly	Render	Concrete
Double Type 4			Mostly timber	Brick	Brick	Brick					Concrete
Single Type 2			Mostly timber	Brick	Brick	Brick					Concrete
Notes											
Bricks are 1st stock multi reds/browns 50%/50%											
Roof Tiles are brown/grey											

Spreadsheet showing proposed housing types and materials
The DAS states that 'materials should reflect local vernacular traditions of the immediate area', yet clearly they do not.

We find the comments in the DAS regarding the Built Environment (p9) somewhat disingenuous viz:

'Ensure new development compliments existing settlement character'

*'Ensure new development compliments existing settlement structure and grain' (see also DAS p17 para 1.4.3)
Elevations to compliment neighbouring properties'
Consider proximity of the Conservation Area.'*

Indeed, we would suggest that the 'Colwinston Illustrations' included with the Application are somewhat counter-productive to the Redrow 'case' serving to indicate just how important in terms of scale and prominence this existing site actually is within the visual landscape, and that the 'Proposed Street Scene' drawing only reinforces the comments above that this is indeed a 'RED' row (particularly the view from the east - Street Scene 'A'), atypical of the area and should be resisted.



2.0 Scale of Development

We have looked at the %'s of development at different times and the scale/% development currently proposed. We are, however, also cognisant of potential future residential pressures and other (withdrawn) applications, and will comment on the potential subjugation of the original settlement by even more extensive housing development in adjacent fields.

Most, if not all, the modern development within the CA has been via minor infill over time nevertheless 27no positive (incl Listed Buildings) exist within the now revised CA of 72 properties (i.e. 37.5%) which is a relatively high percentage, but this has been achieved by recent amendments to the CA.

When Beech Park was developed (1.12ha), outside of the original CA, this was around 11% of the area of the CA at that time (15% of the now revised CA @ 7.66ha).

The current Application site is comparatively large comprising 2.6ha that is 23% of the existing area of Colwinston (11.19ha); 26% of the original (1970s) CA area (10.07ha); and 35% of the now revised CA area (7.66ha).

Indeed, the proposed site is almost as large as Beech Park and The Vines put together (2.79ha).

This potential development is quite the largest that Colwinston would have experienced in its history.

We are further concerned that other applications may be afoot to bring forward sites adjacent to these fields and to effectively fill this minor valley with residential development.

It is clear from Redrow's plans that a spur (with footpaths) has been left towards the east half way down the site which suggests a further potential phase 'B' of development.

Moreover, discussions with owners along the road past Maes-y Bryn towards the A48 have indicated that further applications are 'in the pipeline', or have been temporarily withdrawn.

3.0 Coalescence

The potential coalescence between Maes y Bryn and Colwinston (c.f. Report of Objections on the UDP volume 2 - November 2000) has been commented on by Planning Inspectors in the past, an objection upheld and an appeal (on 0.16ha of the field forming the entrance to Redrow's proposals) dismissed viz:

'ISSUE:

C5.1 Whether land to the north of St. David's Church Primary School should be included within the Colwinston residential settlement boundary.

Conclusions:

C5.2 The objection site consists of a small field enclosure located between the Primary School and the Maes-y-Bryn housing development and comprises about 0.16ha. The landscape of the objection site is open and characterised by a natural environment that contributes to the rural nature of the village. It is an area which, as a previous Inspector has concluded in dismissing an appeal on this site, has: *"far more in common with ... open countryside ..and is .. part of the open rural setting of the village and not part of the built up area itself"*.

C5.3 Moreover, the site provides a natural gap between the main residential part of the village and houses that constitute a physically separate ribbon of houses within open countryside. The further consolidation of this ribbon of development by built development would not only result in a loss of openness but would unacceptably affect the rural character and appearance of the village. As such I do not consider that its development would constitute either acceptable "infill" or "small-scale rounding-off" under the provisions of the policies of the plan as I have recommended should be modified. Consequently I find no reason to recommend the inclusion of this site within the residential settlement boundary of Colwinston.

RECOMMENDATION

REC.4.42 I recommend that no modification be made to the plan.'

(Inspectors: Mr C Cardinal DipTP MRTPI and Dr David Robins BA PhD FRTPI)

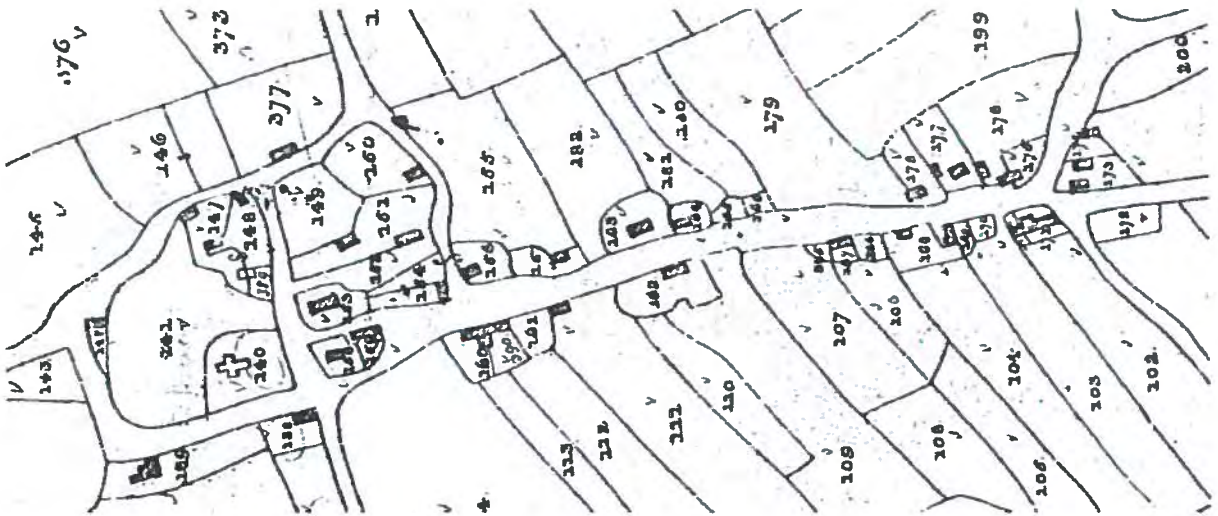
We consider that these comments still apply to this particular area, and would as equally apply to the other fields between Maes-y-Bryn and Colwinston which are the subject of this current Application.

We are also aware that another outline application for the same land for residential development (of a type/density to the satisfaction of the LPA) was refused on 06/12/1988.

4.0 Historic Linear Settlement Pattern

Colwinston has an historic E/W linear settlement pattern stretching out eastwards from the Church of St. Michael and All Angels (Grade I c.1111) including its Churchyard Cross and Walls (both listed grade II) and Old Parsonage (Grade II) to the Village House (Grade II), The Sages (Grade II) and Colwinston House and Ramblers both designated County Treasures in the east.

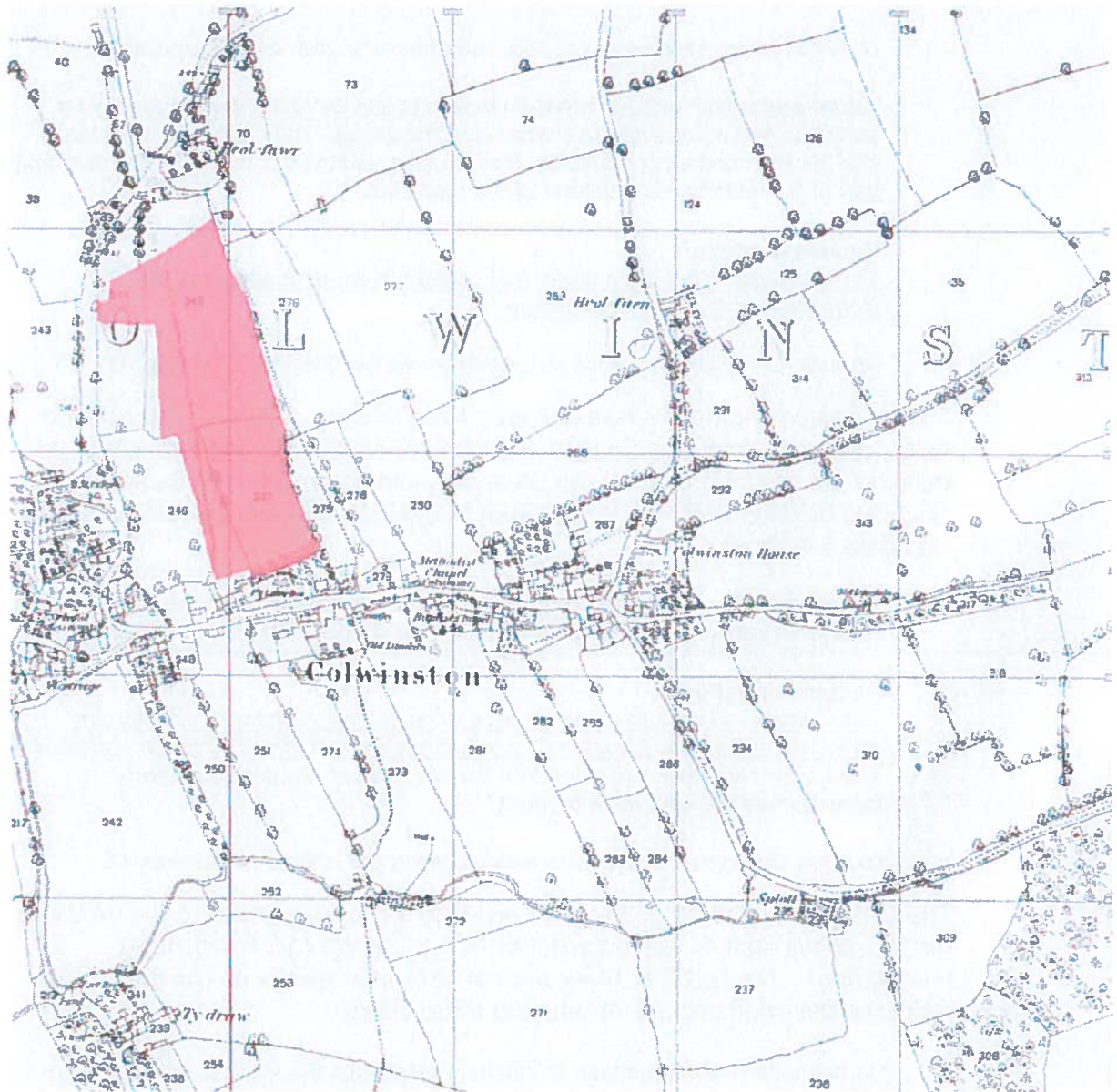
This east west axis is indicated on the Colwinston Tithe Map c. 1840 (p13 CA CMP 2009) and more clearly on the First Edition Ordnance Survey Map 1878 copied by Anthony Jellard Associates in the current Application. Indeed, this latter illustration serves to point out (only too clearly) the potential radical nature of the currently proposed development towards 'Heol-fawr' notwithstanding St. David's School and Beech Park.



Tithe Map c. 1841



Original stone wall and newly laid hedge



First Edition Ordnance Survey Map 1878

The damage to the settlement pattern, and nature of the CA, by a new and stronger N/S axis cannot be over emphasised.

5.0 Rural Aspect, Open Space and Views

We are concerned at potential loss of rural aspect/setting for the CA, the potential loss of open space and of views in/out of the CA (whether noted by the LPA in their CMP, or not).

To quote from the Conservation and Management Plan:

'The **landscape setting** of the Conservation Area is very important and is notable for its rural location.'

'Recommendation:

Development which impacts in a detrimental way upon the immediate setting of the Conservation Area will be resisted. The Council will resist applications for change on the edges of the Conservation Area which would have a detrimental effect on the area's setting.

'**Open areas** and 'greens' between buildings and groups of buildings play an aesthetic part in forming the character of the village. They can improve access into the surrounding countryside, frame vistas, enable distant views or are simply part of the historic development of the rural place.'

Recommendation:

The development of open areas that contribute to the character of the Conservation Area will be opposed.

The landscape and open space between Maes yr Bryn, St David's School and fields leading to/from the dip behind Beech Park are of key importance in defining the northern edge of the CA and should be preserved/enhanced. The proposed development will detract from this setting and reduce openness. (c.f. also para 3.0 above).

There are many **short and long views** into, out of and through the Conservation Area which make a positive contribution to its special character.

Recommendation:

The Council will seek to ensure that all development respects the important views within, into and from the Conservation Area, as identified in the appraisal. The Council will seek to ensure that these views remain protected from inappropriate forms of development.

The CMP (2009) should clearly have included those views from/to the CA along the N/S public right of way adjacent to Forge Cottage (c.f. frontispiece photograph). The fact that these are not shown on plan is an oversight. The proposed development will intrude into these views.

Some modern developments do not harmonise with the historic character and appearance of the Conservation Area. This applies to small extensions and garages as well as larger development schemes.

Recommendation:

Development proposals will be judged for their effect on the area's character and appearance as identified in the Colwinston Conservation Area Appraisal together with relevant Development Plan policies and any other material considerations.

The Council will continue to ensure that all new development accords with policies in the Unitary Development Plan and any other policies which supersede this in the emerging Local Development Plan (LDP).

The Council has a statutory duty to ensure that the character of the designated Conservation Area is preserved and enhanced (Section 27 - Planning - Listed Buildings and Conservation Areas - Act 1990) and the proposed development will detract from the Conservation Area's character and appearance.

Furthermore, policies in the still current UDP (1996-2011) specifically apply viz:

ENV 17 (Protection of Built and Historic Environment)
ENV 20 (Development in Conservation Areas)
ENV 24 (Conservation and Enhancement of Open Space)
ENV 27 (Design of New Developments)
SPG2 Conservation Areas in the Rural Vale

MD9 (Draft LDP) Historic Environment

Also of wider relevance are:

ENV 1 (Development in the Countryside)
NV2 (Agricultural Land)
ENV 10 (Conservation of the Countryside)
ENV 11 (Protection of Landscape Features)
ENV 16 (Protected Species)
HOUS3 (Dwellings in the Countryside)

6.0 Loss of agricultural land/green landscape/visual amenity

The site is formed in large part of grade 2 and 3a quality agricultural land (comprising 84% or 2.1ha) with some 3b land (0.4ha), and whilst there is no requirement to consult Welsh Government regarding its potential loss because it is under the 20ha threshold ...

Kernon Consultants clearly state that:

"Para 4.3 Planning Policy Wales (2012) notes in paragraph 4.10.1 that high quality land is recognised as a finite resource which should be conserved for the future, wherever possible. Such land is described as that graded 1, 2 and 3a in the Agricultural Land Classification (ALC) system and is described as **"best and most versatile agricultural land"** (BMV)."

"Para 4.4 The policy states that **"Considerable weight should be given to protecting such land from development, because it is of special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade"**.

However Kernon Consultants conclude that :

"Para 6.2 In practical terms the mixed distribution of grades across the site means that the Grade 2 land will never be able to be fully exploited as it has to be farmed in conjunction with areas of Grade 3a and 3b. Further the Provisional ALC plan demonstrates that much of the land in the Vale of Glamorgan to the south of Colwinston is also likely to be Grade 2. Accordingly any development of agricultural land in the area is likely to involve some Grade 2 land.

"Para 6.3 In summary the loss of this small area of **"best and most versatile quality agricultural land"** is not significant.

We seriously disagree that this potential loss is 'insignificant' in relation to the village of Colwinston and the setting of the CA.

Anthony Jellard Associates have used the LANDMAP assessment of landscape character viz:

COLWINSTON

LANDMAP CATEGORIES

Aspect Areas	Outstanding	High	Moderate	Low
Visual and Sensory			X	
Historical Landscape		X		
Cultural Landscape		X		
Geological	X			
Habitats			X	

... and noted (para 2.24) that:

"... one of the LANDMAP scores is outstanding, two are high, and two are moderate, including Visual and Sensory."

They have then:

"assessed the overall sensitivity of the existing landscape resource based on the following representative criteria:

- Existing land use;
- Landscape scale and pattern;
- Landscape value and quality;
- Nature of views and degree of visual enclosure and openness;
- Landscape designations present; and
- Scope for mitigation.

... to be "Medium".

Anthony Jellard Associates have then reviewed the proposed development and landscape mitigation measures and have come to the conclusion that (para 4.10):

"In summary, in terms of evaluation against the LANDMAP data base, we conclude that impacts on the landscape character, while locally significant will only have negligible to slight adverse impact on the wider landscape due to the visually contained nature of the site and the proposed structural landscape boundary treatment. "

We disagree entirely that the site is as much 'visually contained' as purported and would refer the LPA to the photographs of the site (below) from different public viewpoints, and with reference to the plan/illustration of the 'structural landscape

boundary' treatment i.e. Street Scene 'A' below, that the latter is/will have a significant impact/migitation effect.

Indeed, what the reference to:

"a defensible boundary to further development."

.. means when clearly little by way of enhancement appears to be planned is unclear.



View of the Site from Yew Tree Close



Proposed site entrance off un-named road from the west - land subject of Planning Refusal (c.f. 3.0 above)



View of the Site from the road junction to the east of Colwinston



View of the Site from residence on Maes-Y-Bryn

Messrs Jellard indicate that:

"Colwinston is one of a number of small nucleated settlements set within a largely regular pattern of medieval fields. While many of these original boundaries have been removed for agricultural efficiency, the earlier historic character is still present and the medieval strip fields can be seen in the landscape around Colwinston" (para 2.9)

"The southern Site boundary consists of a dry stone wall, (one of the earlier village walls) and marks the edge of the Conservation area at this point." (para 2.5)

"The area is clearly a distinctively Vale landscape with plateau topography and limestone buildings." (para 2.18)

"Overall there will be a slight beneficial impact on the vegetation when planting becomes established." (para 4.20)

"Several properties in Beech Park with views eastwards over the Site will experience a moderate to major adverse visual impact during construction and immediately thereafter. These impacts would reduce to moderate adverse when structural planting becomes established." (para 4.26)

"The rear views from several houses along the southern Site boundary and south facing properties at Maes y Bryn will also be affected by development of the Site. Impacts are likely to be moderate to major adverse during and immediately after construction reducing to moderate adverse when planting becomes established." (para 4.27)

"The strong existing hedgerows, which would be further reinforced with additional tree planting, would reduce the visual impact of new housing. Given these factors, the visual impact on users of this public footpath is assessed as moderate to major adverse during construction, moderate adverse immediately after construction reducing to moderate to slight adverse when mitigation planting becomes established." (para 4.42)

We are, however, at somewhat of a loss to understand para 4.18 which states that:

"In summary, the proposed Site relates well to the settlement form of the village with all significant views into and out of the Conservation Area being protected. No existing trees would be removed and new planting will enrich the wider village landscape. Losses of existing hedges to allow for access will be minimised and more than compensated with by new boundary hedgerow planting. The proposed structural landscape treatment, which will build on existing landscape features, would provide a strong defensible boundary to further development to the east of the Site. The layout and design of the proposed housing is carefully designed in a way which can make a positive contribution to the particular and distinctive qualities of Colwinston."

How ? ... when the form, styles and materials of dwellings and site landscape differ quite distinctly from those of Colwinston village and there is no eastern boundary treatment, in fact, it appears an existing tree is actually removed on this eastern boundary.

Comments in relation to Policy ENV17 also appear somewhat at odds with our understanding of the proposed plans:

"We believe that this development would be working within the natural constraints of the landscape around Colwinston. It respects the historic form and development of the settlement. It is an appropriate landscape use given the existing adjoining land uses of built development on three sides. The proposed structural landscape treatment will

provide a strong defensible landscape treatment along the eastern edge of the Site and be a barrier to further development."

"A proper assessment has been made in this LVIA of likely impacts on the Colwinston Conservation Area. It has been concluded that the development does respect the essential qualities of the Conservation area and does not significantly impact on the setting."

We also fundamentally disagree that the numbers of 'viewers' should be a factor in making any judgement of significance of the magnitude of visual impact.

In essence we do not consider that:

"This development has been conceived within a full understanding of local landscape character." (para 5.7)

Nor that:

"It respects the historic development form of the village and is in scale with the settlement size." (para 5.7)

For all the reasons given previously above.



Restored stone boundary walling

**AGRICULTURAL LAND QUALITY
STATEMENT**

FOR

**LAND TO REAR OF ST DAVID'S PRIMARY
SCHOOL**

Prepared For

**COLWINSTON COMMUNITY COUNCIL
COLWINSTON
COWBRIDGE
VALE OF GLAMORGAN**

Prepared By
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1. INTRODUCTION

Graham Leaver of Egis Consultancy Ltd has been instructed by Colwinston Community Council to prepare an agricultural land quality statement in response to the planning application for the development of 62 residential houses on a greenfield site, which is 2.6ha (6.4 acres)

A planning application reference number 2014/0242/FUL has been made to the Vale of Glamorgan Council for this development, and is in the process of being assessed by the Council. Colwinston Community Council is opposed to this application and has prepared a statement detailing the reasons for this. In this statement the Community Council has listed the relevant policies of the Vale of Glamorgan Council's UDP, which was formally adopted by the Council in April 2005. The Community Council also refer to Planning Policy Wales (Edition 5 2012) and Technical Advice Notes TAN 12 (Design) and TAN 22 (Sustainable Buildings)

There are 10 UDP policies listed in the statement, but Graham Leaver, who is an experienced agricultural consultant has been asked to focus on UPD Policy ENV 2, the Protection of Agricultural Land in his statement. The statement is required because 84% of the land within the proposed site is either Grade 2 or Grade 3a quality. The grade of land has been classified as the best and most versatile and the main objective of Policy ENV2 is to protect agricultural land of this quality from irreversible development, unless where an overriding need can be demonstrated

2. AGRICULTURAL LAND CLASSIFICATIONS (ALC)

The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. For town and country planning purposes, best and most versatile (BMV) land is defined as Grades 1, 2 and 3a by planning policy guidance (Planning Policy Wales Edition 6 2014). This is the land which is most flexible, productive and efficient in response to inputs and which can

best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 form between 1-1.5% of all farmland in Wales. There is no data related to the area of Grade 3a land in Wales, but it accounts for half the farmland in England and Wales

The ALC system is used by Natural England and others to give advice to planning authorities, developers and the public if development is proposed on agricultural land or other Greenfield sites that could potentially grow crops. The Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended) refers to the best and most versatile land policy in requiring statutory consultations with Natural England. Natural England is also responsible for Minerals and Waste Consultations where reclamation to agriculture is proposed under Schedule 5 of the Town and Country Planning Act 1990 (as amended). The ALC grading system is also used by commercial consultants to advise clients on land uses and planning issues.

A Provisional Series of maps was published on an Ordnance Survey base at a scale of One Inch to One Mile in the period 1967 to 1974. These maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance. They show only five grades: their preparation preceded the subdivision of Grade 3 and the refinement of criteria, which occurred after 1976. They have not been updated and are out of print.

3. PLANNING POLICY

Both Planning Policy Wales Edition 6 2014 (PPW) and the Vale of Glamorgan UDP are very clear in their guidance regarding the conservation of the best and most versatile agricultural land. In PPW Paragraph 4.10.1 it states that land of grades 1, 2 and 3am is the best and most versatile land and should be conserved as a finite resource for the future. Therefore in development plan policies and development management decisions considerable weight should be given to protecting such land from development because of its special importance. This land should only be developed if there is an overriding need for development and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation that outweighs agricultural consideration

Policy ENV2 of the Vale of Glamorgan UDP states that the best and most versatile agricultural land (Grades 1, 2 and 3a) will be protected from irreversible development unless an overriding need can be demonstrated. Non-agricultural land or land of lower quality should be used when development is proposed, unless such land has a statutory landscape, nature conservation, historic or archaeological designation, which outweighs agricultural considerations

4. DEVELOPER'S JUSTIFICATION FOR DEVELOPING THE PROPOSED SITE

In the planning statement by Nathaniel Lichfield and Partners on behalf of Redrow Homes Ltd, there is no justification for developing land that is predominantly classified as Grade 2 or 3a. In Section 5 headed Planning Policy Context there is no mention or reference to the stated aim of the Welsh Government to conserve the best and most versatile agricultural land. There is also no mention of reference to Policy ENV2 of the Vale of Glamorgan's UDP, which is the policy for the development of agricultural land. In fact it is not even listed as a relevant policy, which it clearly is.

The overriding impression given by the developers is that the quality of the agricultural land of the proposed site is unimportant and indeed not relevant to this application. They did submit an Agricultural Land Classification Survey Report, which concluded that 84% of the proposed site was either Grade 2 or Grade 3a, but there was no justification for an overriding need for development. This only adds weight to the view that its classification is not important

However the applicants commissioned an ecological survey, and their conclusion from this survey is that there is no evidence supporting the need for ecological constraints in relation to the proposed application site. Measures to redress the loss of habitat by the development are proposed in the planning statement

5. JUSTIFICATION FOR REFUSING THIS PLANNING APPLICATION ON AGRICULTURAL LAND CLASSIFICATION GROUNDS

Both PPW and the Council's UDP are quite clear in their policies regarding the conservation of the best and most versatile agricultural land. It should be protected from irreversible development unless an overriding need can be demonstrated. Therefore the onus is on the developer to demonstrate this need, and this has not been done in the planning statement and other supporting documents that form part of this planning application

National statistics show that land classified as either Grade 1 or 2 totals 1.5% of the total land area of Wales. Even though the proposed area is less than 3ha granting planning permission for development would send a signal to developers that it is acceptable to continue to reduce the area of best agricultural land in Wales at the expense of housing development. This cannot be sustainable at a time when there is a growing risk of global food shortages and the number of people affected by starvation is increasing

The Welsh Government recognises the need to protect the best agricultural land from development and this is reflected further in the policies of the Council's UDP. Yet this application seeks to justify developing land that is predominantly Grade 2 or 3a in part by indicating that a mix of grades somehow diminishes its agricultural value. Besides offering no evidence to support this it has also been overlooked that both grades are still regarded as agricultural land that is the best and most versatile

The developers' argument might have carried more weight if one of the land grades had been 3b or worse, as national and local planning policy looks

more favourably on planning application to develop land that is of this quality. However this is not the case and even though there is evidence of a mix of grades, the quality of the land is still classified as the best and most versatile agricultural land.

It is not unusual for there to be mix of land grades even within a field. When land is ploughed and prepared for crops or re-seeding grassland, it is often evident that within the field there are different soils and textures. These can be seen by the naked eye but they do not diminish the quality and value of the land. If they do where is the evidence to support this? This evidence is crucial to determining whether the land quality is compromised by a mix of land grades, and as previously mentioned no evidence has been offered. There is also no reference to the mix of grades diminishing the agricultural land value in either PPW, TAN 6 or the UDP, so the developers have no support from planning policy in this respect

One of the main benefits of land that is classified as Grade 2 or 3a is its agricultural flexibility. Only 3% of land in Wales is used for growing cereals and this is almost exclusively on land that falls in the Grades 1-3a, whose definitions range from good to excellent quality agricultural land. Land in these classifications can be used for growing cereals as well as grassland, although its flexibility diminishes between grades 1 and 3a. Therefore to lose this land to irreversible development would mean that another parcel of land that can be used for cereals as well as grassland will be lost

The only exemption for allowing development on agricultural land classified as grades 1 – 3a is where an overriding need can be demonstrated and non-agricultural land or land of lower quality cannot be used for development because such land has a statutory landscape, nature conservation, historic or archaeological designation and these outweigh agricultural considerations. As I am not a planning consultant I am unable to verify whether there is an overriding need. However the statement by Colwinston Community Council states that such a need has not been demonstrated. Therefore there is no reason to permit development on agricultural land of this quality

Land usage in itself is not a reason for refusing planning applications. The Community Council state that this land is primarily used as paddocks for horses and growing hay and could be used for growing cereals or grazing agricultural livestock. This land would be eligible for farm subsidy, as it would be classified as in agricultural production. However besides being a loss of more land from agricultural production, which is contrary to planning policy for this grade of land, it is also a loss of open space and paddocks as a local amenity, which is also contrary to current planning policies

6. CONCLUSION

There is very clear guidance in both PPW and the Vale of Glamorgan's UDP regarding the use of agricultural land, which is classified as between grades 1-3a for development that is irreversible. It clearly states that unless an overriding need can be justified then planning permission on this quality of land should be refused

This planning application and its supporting documents have failed to justify an overriding need for 62 houses on land that is predominantly classified as grade 2 and grade 3a agricultural land. There is no reference to any policies regarding agricultural land in the planning statement, and only a vague and unsubstantiated reference to a diminishing of the agricultural value of the land in question because the land is a mix of both of these grades.

Therefore this report concludes that the planning application should be refused as it is a development on ground that is defined as the best and most versatile

APPENDIX 1

DESCRIPTION OF THE GRADES AND SUBGRADES

The ALC grades and subgrades are described below in terms of the types of limitation which can occur, typical cropping range and the expected level and consistency of yield. In practice, the grades are defined by reference to physical characteristics and the grading guidance and cut-offs for limitation factors in Section 3 enable land to be ranked in accordance with these general descriptions. The most productive and flexible land falls into Grades 1 and 2 and Subgrade 3a and collectively comprises about one-third of the agricultural land in England and Wales. About half the land is of moderate quality in Subgrade 3b or poor quality in Grade 4. Although less significant on a national scale such land can be locally valuable to agriculture and the rural economy where poorer farmland predominates. The remainder is very poor quality land in Grade 5, which mostly occurs in the uplands.

Descriptions are also given of other land categories which may be used on ALC maps.

Grade 1 - excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly includes top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.

Grade 2 - very good quality agricultural land

Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1.

Grade 3 - good to moderate quality agricultural land

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.

Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 - poor quality agricultural land

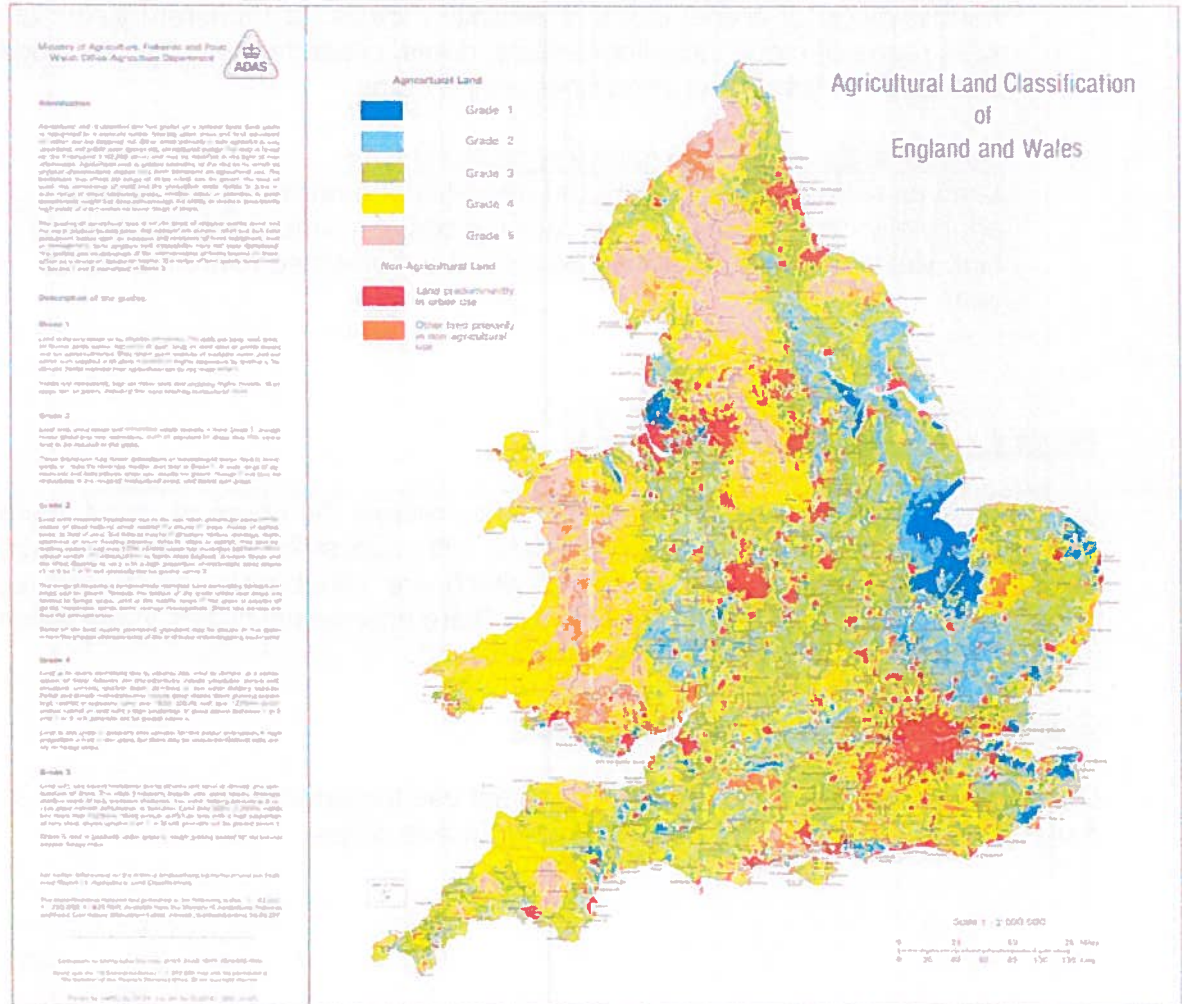
Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (e.g. cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 - very poor quality agricultural land

Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

APPENDIX 2

Agricultural Land Classification Map



Content

- 1 Introduction
- 2 National and Local Policies
- 3 Proposed Development
- 4 Traffic and Vehicular Movement
- 5 Road Safety
- 6 Conclusion

1 Introduction

- 1.1 Traffic and Transport Planning has been instructed by Colwinston Community Council to review the Transport Assessment submitted with the Planning Application for 62 dwellings on land located adjacent to St. Davis's Church in Wales Primary School:



- 1.2 Planning Policy Wales; Technical Advice Note 18: Transport (TAN 18) states that:

“9.1 Transport assessments provide the information necessary to assess the suitability of an application in terms of travel demand and impact”

- 1.3 The submitted TA has been reviewed in the context of TAN18 guidance and related transport planning policies.

2 National and Local Policies

2.1 TAN18

- 2.1.1 Issued in March 2007 TAN18 stresses the importance of integration between land-use planning and development of transport infrastructure and promotion of housing developments with good access by walking, cycling and public transport:

- "2.3 Promoting resource and travel efficient settlement patterns;*
- Ensuring new development is located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion;*
 - Managing parking provision;*
 - Ensuring that new development and major alterations to existing developments include appropriate provision for pedestrians (including those with special access and mobility requirements), cycling, public transport, and traffic management and parking / servicing;*
 - Encouraging the location of development near other related uses to encourage multi-purpose trips*
- Promoting cycling and walking;*
- Supporting the provision of high quality, inclusive public transport;*
 - Promoting the location of warehousing and manufacturing developments to facilitate the use of rail and sea transport for freight;*
 - Encouraging good quality design of streets that provide a safe public realm and a distinct sense of place; and*
 - Ensuring that transport infrastructure or service improvements necessary to serve new development allow existing transport networks to continue to perform their identified functions."*
- "3.1 The land use planning system can impact on travel patterns, by guiding the location, scale, density and mix of new development and controlling changes of land use... Planning authorities should ensure that their development plan strategy is compatible with the aim of reducing the need to travel and provides greater choice of means of transport other than the private car".*
- "3.3 The location of new residential development has a significant influence on travel patterns as the majority of trips start and finish at home. Housing is also usually the most extensive land use in settlements. As a consequence, the relationship between homes and other land uses will influence travel demand in terms of mode of travel, length of journey and the potential for multi-purpose trips. It should be a key aim of development plans to identify residential sites that are accessible to jobs, shops and services by modes other than the car and where public transport services have the existing or planned capacity to absorb further development. Local authorities should seek to achieve a broad balance between housing and employment opportunities to minimise the potential need for long distance commuting".*
- "3.4 Promote housing development at locations with good access by walking and cycling to primary and secondary schools and public transport stops, and by all modes to employment, further and higher education, services, shopping and leisure, or where such access will be provided as part of the scheme or is a firm proposal in the RTP"*
- "6.2 When preparing development plans...authorities should ensure that new development encourages walking as a prime means for local journeys by giving careful consideration to location, access arrangements and design, including the siting of buildings close to the main footway, public transport stops and pedestrian desire lines".*
- "6.4 Development plans...should encourage cycling through ensuring that new development encourages cycling by giving careful consideration to location, design, access arrangements, travel desire lines through a development, and integration with existing and potential off-site links".*
- "7.3 When preparing development plans...planning authorities should where appropriate consider the need for better or new public transport access to new developments"*

2.2 Planning Policy Wales (PPW)

Issued in 2014 PPW sets out the land use planning policies of the Welsh Government with transport guidance detailed in Chapter 8. The Welsh Government aims to extend choice in transport and secure accessibility

in a way which supports sustainable development and helps tackle the causes of climate change by encouraging a more effective and efficient transport system with greater use of the more sustainable and healthy forms of travel to be achieved through integration:

"8.1.1 Within and between different types of transport;

- Between transport measures and land use planning;*
- Between transport measures and policies to protect and improve the environment; and*
- Between transport measures and policies for education, health, social inclusion and wealth creation.*

"8.1.4 Land use planning can help achieve the Assembly Government's objectives for transport through:

- Reducing the need to travel, especially by private car, by locating development where there is good access by public transport, walking and cycling;*
- Locating development near other related uses to encourage multi-purpose trips and reduce the length of journeys;*
- Improving accessibility by walking, cycling and public transport;*
- Ensuring that transport is accessible to all, taking into account the needs of disabled and other less mobile people;*
- Supporting the provision of high quality public transport;*
- Supporting traffic management measures;*
- Promoting sustainable transport options for freight and commerce;*
- Supporting sustainable travel options in rural areas;*
- Supporting necessary infrastructure improvements; and*
- Ensuring that, as far as possible, transport infrastructure does not contribute to land take, urban sprawl or neighbourhood severance.*

2.3 Vale of Glamorgan Deposit Local Development Plan

2.3.1 The VoG LDP Policies support PPW and TAN18 and focus on sustainable transport improvements to reduce significantly the need to use a private car.

"5.56 The delivery of planned housing and strategically important employment sites will be dependent upon the implementation of key sustainable transport and highway improvement schemes."

"6.90 Policy MG 16 identifies and, where necessary, safeguards land required for transport proposals for the LDP, providing improvements which will support the strategic objectives of the Plan and realise enhanced sustainable transport facilities and highway improvements. Many of the schemes identified are included in and supported by the South East Wales Transport Alliance's (Sewta) Regional Transport Plan and others are ongoing schemes or form elements of committed development-led proposals. The schemes identified in Policy MG 16 are at differing stages of development and therefore while definitive route alignments are available for some proposals for others only indicative alignments are available. All routes and areas to be protected are illustrated on the Proposals Map.

"6.92 Walking and Cycling are sustainable and practical alternatives to the private car, supporting healthy lifestyles and reducing the impact on the environment. An essential element in encouraging an increase in walking and cycling is the provision of a network of high quality dedicated routes that link communities and provide access to

local

retail, employment and recreation opportunities. The LDP will seek to encourage and give priority to those proposals that enhance opportunities for walking and cycling"

"6.100 Enhanced public transport services and infrastructure facilitate more frequent and reliable public transport services and encourage greater patronage, reducing the reliance upon the private car and benefiting the environment (Para 6.100)

3 Proposed Development

3.1 The TA describes the proposed residential development and existing transport facilities and in line with PPW, TAN18 and the LDP stresses the need for accessibility:

"2.3 One of the main factors demonstrating the suitability of a development site is its accessibility by non-car modes of transport. This helps to reduce the reliance on the use of the private car as well as promoting the aims of sustainable travel choices"

3.2 Non-car travel

3.2.1 The area within 2km of the site is shown in Fig 2 and it is suggested in the TA that people will choose to walk to destinations within this area. Employment, retail or leisure options within 2km from the site are very limited and as the highways have no footways accessibility by walking will be hazardous.

3.2.2 A 5km area for cycling is shown in Fig 2 but there are no cycleways within this area.

3.2.3 National and Local transport planning policies also require residential developments to be served by public transport. The nearest rail station is Bridgend and a journey by private car or taxi will be necessary.

3.2.4 The TA refers to the Greenlink community transport buses provided by the Vale of Glamorgan. A potential passenger has to contact the Co-ordinator who will call back at least 24hrs prior to travel to confirm booking. These services are welcome but are unlikely to reduce significantly journeys by private car.

3.2.5 The TA confirms that use of public transport will be very low:

"4.16 The number of residents identified in Table 4.5 show that as a result of the development proposals there will not be any adverse impact on the capacity of existing public transport services i.e. bus and rail services within the area as the demand for such modes of transport, based on historical trends is expected to be low."

3.2.6 The proposed residential development will not be sustainable as there will be no attractive facilities within walking/cycling distances and only very limited public transport.

3.3 Trips generated

3.3.1 The TA uses TRICS a National database of land-uses and trip generations to estimate the traffic that will be generated by the proposed development. The database does not include information from areas similar to Colwinston where there is very limited public transport. All TRICS sites used in the TA have good public transport facilities so the trips estimated do not provide an accurate assessment of future flows. In practice the generated flows will be significantly higher because of the lack of non-car travel mode facilities.

4 Traffic and vehicular movement

4.1 Traffic data

- 4.1.1 To provide an accurate quantitative and qualitative analysis of the predicted impact of development trips baseline transport data has to be included in a TA. The Department for Transport provides advice on the collection of traffic data:

"Surveys should be carried out during a 'neutral', or representative, month avoiding main and local holiday periods, local school holidays and half terms, and other abnormal traffic periods. National experience is that the following Monday to Thursdays can be neutral a) late March and April – excluding the weeks before and after Easter, b) May - excluding the Thursday before and all of the week of each Bank Holiday, c) most of June, d) late September, e) all of October, f) all of November – provided adequate lighting is available; this requirement often dictates the timescale of the appraisal. Data processing may also add substantially to the study timescale. In addition, if existing data are to be reused, ample time must be allowed for them to be identified, obtained from their current custodian, reprocessed as necessary, and checked for consistency and validity. Further delays may be incurred if these checks reveal that the data cannot be used." (DMRB Volume12 Section 2 Para 3.1.4)

The traffic data used in the TA was collected in December which is not a neutral or representative month so the following conclusion cannot be justified:

"2.22 The results from the ATC demonstrate that the highway adjacent to the school carries very low volumes of traffic and is considered to operate significantly below its design capacity, with the peaks coinciding with the start and end of the school day."

- 4.1.2 Traffic data for Crack Hill (route A48) is included in the TA but there is no indication of the collection date or the location of the traffic counter.

4.2 Swept paths

- 4.2.1 Swept paths have been carried for medium size cars and refuse vehicles. It is normal to use a large car when assessing movements. Large cars are popular in Colwinston so the TA should re-visit these tests.
- 4.2.2 The refuse vehicle swept paths show vehicles entering and leaving the site and turning on-site. Refuse vehicles entering and leaving the site will have to use the full width of the public highway which will block through traffic.
- 4.2.3 On site refuse vehicles will be unable to use the turning heads of the cul-de-sacs and will have to reverse into each these roads. This is an unsafe movement and should not be considered appropriate or acceptable for a new residential development.

5 Road safety

5.1 Visibility

5.1.1 Cars park in the road near the school which will obstruct visibility from the site access road:



St. David's Church in Wales Primary School

5.1.2 The two roads serving Colwinston with accesses onto route A.48 have below standard visibility splays for the 60mph speed limit. In the TA it is assumed that all vehicles generated by the proposed development will use the Crack Hill junction to join route A.48. For a 60mph speed restriction TAN18 states that a junction should have a visibility splay in both directions of 215m. The splay to the right at Crack Hill is around 160m so additional turning traffic will make the junction more hazardous.

5.1.3 The alternative (Twmpath) some 1100m west of this junction has a similar poor visibility splay to the right:



Crack Hill junction



Twmpath junction

5.2 Local Highway Network

5.2.1 Colwinston is a rural village and has a poor local highway network. Many sections of road are narrow with no footways as shown below:



6 Conclusion

6.1 National and Local Transport Policies

6.1.1 All the policies stress the importance of designing new residential developments to ensure that there is more walking, cycling and use of public transport with the aim of reducing journeys by private car. The location of this proposed residential development does not support these transport/land-use policies. There are no walking and cycling facilities near to the development site and no regular bus services. The lack of appropriate facilities makes this proposed development unsustainable.

6.2 Proposed development

6.2.1 The calculation of the number of trips that will be generated by the development has not taken into consideration the limited non-car travel facilities in the area. The data has been based on information collected from residential areas well served by public transport so the peak hour trips generated will be significantly higher than those estimated in the TA.

6.3 Traffic and vehicular movement

6.3.1 The DfT states that traffic data collected in December is not neutral or representative. The use of December base data in the TA is not suitable for assessing traffic impact on the local highway network.

6.3.2 It is normal practice for the car swept path to be measured using 'large cars'. The TA used 'medium cars' which does not reflect modern car ownership and usage in the Colwinston area.

6.3.3 The swept paths for refuse vehicles show that they will have to either reverse into or out of the on-site cul-de-sacs. This will be a hazardous turning movement.

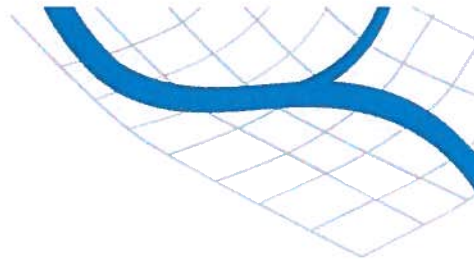
6.4 Road safety

6.4.1 Vehicles park on the road adjacent to the site and will obscure drivers' visibility. The location of the proposed development adjacent to the school will increase the danger for children and parents.

6.4.2 The visibility splays at the Crack Hill and Twmpath junctions are below standard for a 60mph speed limit. Additional traffic will add to road hazards on route A.48.

6.4.3 In conclusion the TA submitted with the planning application showed that the:

- proposed development will not satisfy either National or Local Transport Policies;
- impact on the local highway network will be hazardous and vehicles will not be able to access the development site or manoeuvre the on-site roads in a safe manner;
and
- vehicle trips generated by the development are based on incorrect traffic data and does not provide a good indication of future movements in the area.



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Response to the Drainage Strategy for the Proposed Development at Colwinston (2014/00242/FUL) on behalf of Colwinston Community Council

Harvey J.E. Rodda BSc, PhD, FRGS
Director of Hydrology

17th April 2014
Background

Hydro-GIS Ltd was engaged by Mr Rob Hathaway of Planr Ltd on behalf of Colwinston Community Council to review a planning application submitted by Redrow Homes for the development of land to the rear of St David's Primary School, Colwinston. The development would consist of 62 houses and the associated infrastructure (access roads, parking, drainage and services). The following review considers the risk of flooding at the site and the potential increase in flood risk to the neighbouring properties posed by the development, and provides evidence which can be used to object to the planning application.

Introduction

This review provides details of the documents submitted as part of the planning application (Ref 2014/00242/FUL) and in particular considers how the flood risk at the site has been addressed. A brief summary of the received documents is given and the main limitations are listed. More details on these are then provided and a fuller assessment of the flood risk is demonstrated.

Submitted Documents

The documents received as part of the submission are as follows:

- *COLW-15-04-02 – Planning Layout.pdf*: a map showing the proposed development as a colour drawing;

- *Colwinston Drainage Strategy – Phoenix.pdf*: a 28 page report on the flood risk and surface water management;
- *Colwinston Topo.pdf*: a map showing the topographic survey of the site with spot heights;
- *Redrow 31083 Planning Statement Land to Rear of St David's Primary School Colwinston 26.02.14.pdf*: an 80 page report covering all of the planning aspects such as the history, economics, transport, landscape, and environment;
- *Redrow Site COLW-15-04-01 – Site Location Plan.pdf*: another map of the site as an outline technical drawing.

The issue of flood risk and surface water management is mainly dealt with in the document *Colwinston Drainage Strategy – Phoenix.pdf* and a the summary from this document is included in the *Redrow 31083 Planning Statement Land to Rear of St David's Primary School Colwinston 26.02.14.pdf*. This current review therefore concentrates on the former of these two documents.

Review of the Colwinston Drainage Strategy

Overview

The Colwinston Drainage Strategy is completely inadequate as a submission assessing the risk of flooding at the development site and the management of surface water to avoid increasing the flood risk to neighbouring properties. The document may appear fairly detailed given its length (28 pages) however 17 pages are Appendices consisting of drawings, the results of field work, and output from computer models. The actual text written about flood risk amounts to little more than two pages. This is in contrast to a typical flood risk assessment and hydrology report required for a single sustainable home which is typically 10-15 pages in length. Given that the development is considerable with a total of 62 houses a much more detailed submission would be expected. This is in accordance with the Technical Advice Note 15 (Welsh Assembly Government, 2004) where the level of detail for an assessment of flood risk should be proportional to the size of the development. The areas where the Colwinston Drainage Strategy is lacking information are listed below:

- Background information on the location, area characteristics of the site;
- Background information on the physical features of the site including topography, geology, soils and land use;
- Detail on the hydrology of the site;
- Details on historical flooding at the site;
- Standard current flood risk information;
- Calculation of the greenfield peak flow rate;

- Calculation of the developed site peak flow rate including climate change;
- Calculation of the storage required to ensure the developed site peak flow does not exceed the greenfield peak flow;
- Details on the design of the storage features as part of the sustainable drainage system (SUDS);
- References.

These points are discussed in more detail in the following sections.

Background Information

In order to be read as a free standing document any flood risk assessment or Drainage Strategy should give details on the location of the site with maps. Apart from stating the site is in Colwinston in the Vale of Glamorgan and that it has an area of 2.5ha there is no other information. The location map at a 1:25,000 scale is shown on page 7 of the report but not referred to in terms of the site location. Larger scale maps or aerial photos are often then used to show more details, supported by photos of the site, and these should be accompanied by a description of the overall area.

In addition this section should also summarise the basic physical features of the site. A topographic survey has been undertaken which is presented as a separate map but there is no reference to the topography anywhere in the Drainage Strategy and the map itself is very difficult to read without zooming in as it is just spot heights given in a very small font with very faint contours. A better presentation of the topographic data could be made in the form of a digital terrain model (DTM) showing a colour shaded surface. The geology is described in just one line as "the site is underlain by gravelly clay and cobbles then weathered limestone" which could mean that the limestone is located below the clay and cobbles or is in another part of the site. A better description should be given and reference should be made of British Geological Survey maps and boreholes with the use of proper geological nomenclature. Other maps such as those provided by the EA should be used to show if the site is underlain by an aquifer. The site is also described in the Drainage Strategy as being "conductive to soakaways and rates vary from $1 \times 10^{-04} \text{m/s}$ to $1 \times 10^{-05} \text{m/s}$ ". The text does not state what these rates or measurements actually refer to and give any further classification. The Drainage Strategy states that 1.16 ha of the developed site is impermeable - if this is the case the report should explain which part of the site is underlain by permeable and which part is underlain by impermeable strata.

Hydrology and Historical Flood Risk

No information is presented on the hydrology of the site which is the basic key requirement for understanding the flood risk at the site. Such information should include a map showing the location of the site in relation to the catchment area of the closest water course, information on some of the basic hydrological parameters like annual average rainfall, runoff and losses through evapotranspiration. According to the Flood Estimation Handbook (FEH - Institute of Hydrology, 1999) the standard annual average rainfall at

Colwinston is 1117mm which is among the wetter parts of the UK, so flooding would be expected in some form. The description of current soil conditions and land use are also important as these can both affect the hydrology of the site. There is no description of historical flooding at the site, or in the wider area. Flooding of the site was experienced as recently as January 2014, and also in January 2013, December 2012 (see Figure 1). One resident has described the site as flooding every year. Severe flooding in the Vale of Glamorgan was also experienced in July 2007, October and November 2000, October 1998, December 1979, December 1960, October 1933 and November 1929.



Figure 1. Flooding of the site in December 2012 (*photo: Illian James, Isis, Colwinston*)

The site is reported to be at risk of flooding from an area to the east of the site from surface runoff. This is somewhat of an understatement, the OS 1:25,000 map of the area actually shows the development site is in the floor of an obvious valley falling from east to west. Figure 2 clearly shows the topography using a 5m DTM, derived using Geographical Information Systems (GIS) software. Using further functions available within the GIS software the flow direction from each DTM cell was calculated and then the flow accumulation was derived. This shows the number of upstream grid cells which flow into each cell. By selection a suitable threshold number of upstream cells the flow accumulation can be used to define the paths that water would take as it flows over the surface, always taking the path of the lowest altitude. The results are

that the development site is right in the path of the natural flow direction which surface water would take during particularly wet conditions.

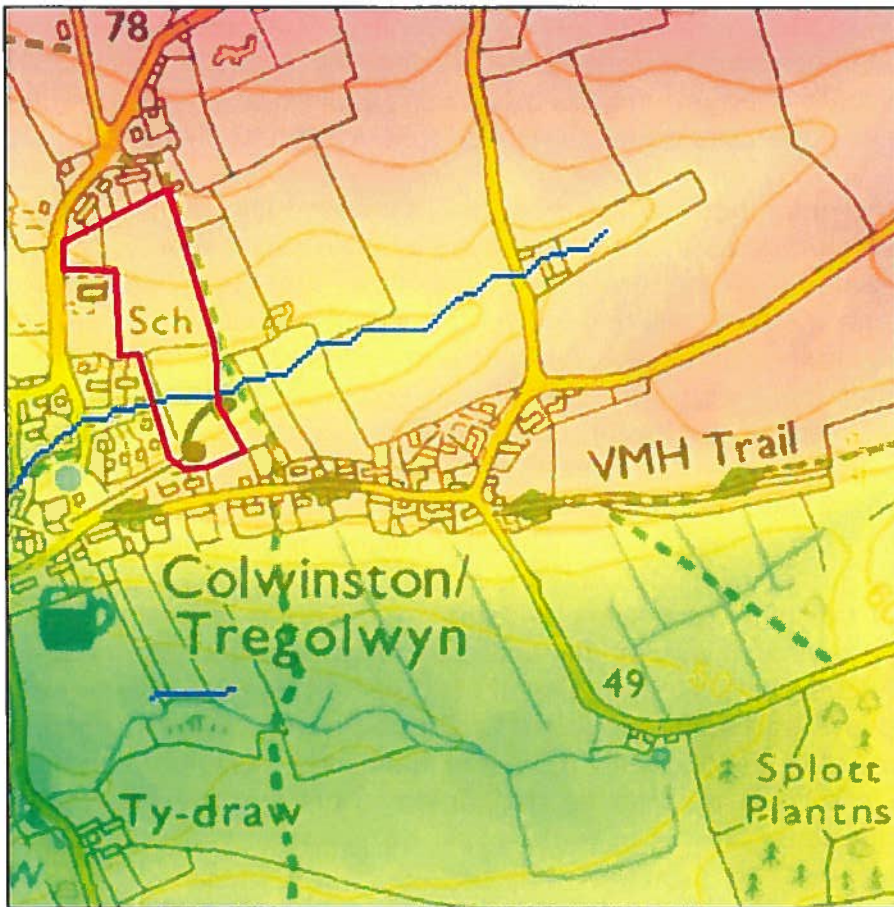


Figure 2. The topography and flow pathways (blue) at the development site (outlined in red). DTM supplied by Infoterra Ltd, colour-ramp shading from green (41m AOD) to red (82m AOD).

An overview of the current flood risk at the site is best demonstrated by presenting the EA fluvial and surface water flood zone maps. A map is shown on page 7 of the Drainage Strategy which is supposed to show the fluvial flood risk as defined by the EA, however there is nothing to show whether this is an actual EA flood risk map or just an extract from an Ordnance Survey 1:25,000 map. The EA flood maps should have been purchased from Natural Resources Wales (NRW) and presented as part of the Drainage Strategy to properly demonstrate the flood risk at the site. In addition NRW can supply maps of historical flooding which include both fluvial and surface water flood outlines.

Surface Water Management

Sustainable drainage systems (SUDS) are often implemented to ensure that the risk of flooding from the development site is not increased. The Drainage Strategy does not include any discussion about SUDS and examples of features which could be included. The role of SUDS is to make a new development with increased areas of impermeable surfaces such as roofs,

roads and driveways, respond to rainfall in the same way as the natural landscape, rather than all of the surface water flowing through drains into the nearest watercourse which is the traditional engineering approach to drainage. The management of surface water should be presented in a way which clearly shows the pre-development or greenfield peak design flow (1 in 100 year), the peak design flow from the developed site (1 in 100 year + 30% to account for climate change) and the measures required to ensure that the runoff from the developed site does not exceed that of the greenfield site.

It is commonly the case that the flow from the developed site requires some form of temporary storage so that it is conveyed into the existing water course at a rate not greater than the greenfield peak flow. The type and size of attenuation storage measure will depend on the volume required, the size of the site and the hydrology of the site. A highly permeable site with a significant depth to the water table would be suitable for soakaways. Infiltration tests have been undertaken as part of the Drainage Strategy but the document is lacking in any calculations of the greenfield or developed site peak flows or required storage volumes. Without this information it is not possible to state what SUDS can be implemented and what the volume requirements are. All that the Drainage Strategy includes in terms of SUDS calculations is a printout in Appendix D of results from the Micro-Drainage computer program. These results are largely irrelevant without any text describing what they are trying to demonstrate. Given that the site is at risk of flooding from the land to the east as demonstrated in Figure 2, the proposed Drainage Strategy will also need to include further calculations to identify the additional flow of water coming from outside the site which will need to be attenuated to prevent the flooding of neighbouring properties.

Questions can also be raised about the timing of the infiltration tests. These were undertaken in early October when the soils were still relatively dry. The annual soil water regime in the UK starts the year with the soil being at field capacity (i.e. holding the maximum amount of water after gravity drainage). Then during the spring as plants grow and take up water from the soil a soil water deficit builds up to a maximum around early autumn when the plant growth and uptake of water then ceases. From the late autumn into the winter the soil water is gradually replenished back to field capacity. In order to consider the infiltration of the soil and the impact of any groundwater for the worst case (i.e. the wettest part of the year) ground investigations including infiltration tests should be taken in the period January to March. Soil maps from Cranfield University (2014) show the area around Colwinston as underlain by slowly permeable and seasonally wet soils with impeded drainage, suggesting a much slower infiltration rate during the winter. The surface infiltration of the soil can be affected by compaction from grazing animals. More tests should have been undertaken at the surface using a splitting infiltrometer. This also gives more accurate results than the simple trial pit infiltration since it prevents the seepage of water in the horizontal plain.

The introduction of the Drainage Strategy makes the point that rainfalls should be increased by 30% to account for climate change but the document does not list any predicted rainfalls. Therefore without any proper and clear calculations and sizing of the required storage volumes the Drainage Strategy should be rejected.

Referenced Documents

The Drainage Strategy makes no references to the key sources of information which should be referred to for such a study. These would include Technical Advice Note 15, the Flood Estimation Handbook, sources of background information at the site (e.g. British Geological survey) and methods used for calculating the greenfield flow (e.g. Marshall and Bayliss, 1994; ADAS, 1981).

Summary

Overall the Drainage Strategy report is inadequate, poorly written and lacking in much important information as follows:

- More information is required on the background of the development site including its location, topography, soils, geology and land use;
- More information is required on the hydrology of the site including annual average rainfalls, losses, and potential extreme rainfall amounts;
- More information is required on historical flooding at Colwinston and surrounding area including the rainfalls associated with historical events;
- Environment Agency flood risk maps should be included;
- Evidence from residents shows that the site is at risk of flooding and has flooded often in recent years;
- A better representation of the topography (including a DTM and flow pathways properly defined using GIS software) demonstrated that the site is in a valley and prone to flooding from the natural accumulation of surface water and groundwater;
- The proposed use of SUDS at the site should be accompanied by estimates of the greenfield peak flow, developed site peak flow and required storage volumes;
- Infiltration tests were taken when the soils were dry in the early autumn and therefore the worst case in terms of infiltration and potential groundwater levels, usually in January-March, was not represented;
- The Drainage Strategy does not make any reference to key documents;

- In its current form the Drainage Strategy report is inadequate and should be rejected.

References

Agricultural Development and Advisory Service (ADAS) 1981. The design of field drainage pipe systems. Ministry of Agriculture Fisheries and Food Report 345.

BGS 2014. Geology of Britain viewer:
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Institute of Hydrology (IH) 1999. Flood Estimation Handbook, Wallingford, Oxfordshire.

Marshall, D.C.W. and Bayliss, A.C. 1994. Flood Estimation for Small Catchments. Institute of Hydrology Report 124, Wallingford, Oxfordshire.

Welsh Assembly Government 2004. Technical Advice Note 15: Development and Flood Risk, Planning Policy Wales, Planning Division 4, Cathays Park, Cardiff.

O'Keefe, Kevin T

From: Lankshear, Robert F
Sent: 02 January 2015 15:44
To: Planning & Transportation (Customer Care)
Subject: FW: Planning Application 2014/00242/FUL Land to the Rear of St David's School Colwinston
Attachments: Alterations to Objection by CCC to Redrow Application Jan 2 2015 (2).pdf; Revised drainage strategy final report Dec 2014.pdf

Please log and print the attached

Robert Lankshear
Senior Planner
Planning and Transportation Services
Vale of Glamorgan Council / Cyngor Bro Morgannwg
tel / ffôn: 01446 704659
e-mail / e-bost: rlankshear@valeofglamorgan.gov.uk

Visit our Website at www.valeofglamorgan.gov.uk
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Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

From: Yahoo! Inc. [<mailto:chairmanccc@btinternet.com>]

Sent: 02 January 2015 12:34

To: Lankshear, Robert F

Cc: Heather Macle hose; Edward Lewis; Brian Kennard; Colwinston CC; Christine Roach; Thomas, Ray (Cllr); Julie Horton; rob@planrltd.co.uk; Wyn Bellin

Subject: Planning Application 2014/00242/FUL Land to the Rear of St David's School Colwinston

Dear Mr Lankshear,

Please find attached two additional reports which form part of Colwinston Community Council's objection to this planning application.

Since the original submission by the Council, the following relevant information has also become available;

- 1 There have been five documented instances of severe surface water flooding in the immediate area since 1994.
- 2 There have been instances of raw sewage overflow from Colwinston Pumping Station after DCWW have carried out works to line the sewer pipes. Natural Resource Wales are investigating these events but clearly the problem of surface water ingress and sewage capacity has not been resolved.
- 3 St David's School will open a Nursery unit in this month following the closure of the village playgroup. The extra children from this unit and, the fact that more pupils joined the school during 2014 means that it now seems unlikely that most of the children from the proposed development could be accommodated within the school's standard number.

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ENVIRONMENTAL
AND ECONOMIC
REGENERATION

4 The drainage infiltration basin proposed by the developer will present a health risk and a hazard to the children living nearby. Due to the underlying rock structure, the drainage strategy will not work, and the basin will be full for substantial parts of the year, a point conceded in the developer's report. This deep water will be mainly stagnant and will put at risk both the health, and safety of those living nearby.

Please would you acknowledge receipt of this e-mail.

Yours sincerely,

G W Bates
Chairman Colwinston Community Council



ALTERATIONS TO ORIGINAL OBJECTION SUBMITTED APRIL 17 2014 (*shown in bold italics*)

PLANNING APPLICATION NO. 2014/0242/FUL

PROPOSAL BY REDROW FOR RESIDENTIAL DEVELOPMENT OF 62 HOUSES AT LAND TO REAR OF ST DAVID'S PRIMARY SCHOOL, COLWINSTON

1.00 Redrow's planning application seeks consent for 62 houses on agricultural land in the countryside outside the village settlement boundary. The site is not allocated in the adopted Unitary Development Plan. ***On Oct 31 2014 the force and thrust and protection of the countryside surrounding Vale communities in relation to large scale housing was recently vindicated by the Planning Inspectorate in the decision to refuse the United Welsh Housing Association and Charles Church Developments Ltd housing development (Ref 2013/00745/OUT) and appeal reference (APP/Z6950/A/14/2213031).***

2.00 Section 38 of The Planning and Compulsory Purchase Act 2004 requires that the Council determine an application in accordance with the development plan unless material considerations indicate otherwise. In development plan terms, the proposal for a housing estate in the countryside would have to be refused as the only reasonable outcome. ***Although some elements of the adopted Vale of Glamorgan Unitary Development Plan 1996-2011 are time expired, its general policies remain extant and it remains the statutory adopted development plan. As such, the proposed development would be contrary to Policy ENV1 which presumes against development in the countryside (i.e. outside settlement boundaries), except certain specified exceptions or development approved under other policies of the Plan. One of those is Policy HOUS13, which provides for exception sites for affordable housing adjoining existing settlements. However, as 80 per cent of the proposed development would be market housing, the proposal does not fall within this exception. Nor does it fall within any other exception criteria. Thus the proposal conflicts with the aims of Policy ENV1 to safeguard the countryside against unnecessary development.***

The additional question then posed by Section 38 – is 'are there any material considerations that would indicate that the application should be approved'? Redrow consider that the allocation of the site under MG 2 (38) in the Council's Cabinet Draft

Local Development Plan is a strong material consideration. The developer also asserts that the lack of a 5 year land supply is also a significant factor that should direct the Council to allowing the development despite it not being allocated in the current development plan.

3.00 Planning Policy Wales indicates that the weight to be given to an emerging draft LDP *'will in general depend on the stage it has reached, but does not simply increase as the plan progresses towards adoption. When conducting the examination, the appointed Inspector is required to consider the soundness of the whole plan in the context of national policy and all other matters which are material to it. Consequently, policies could ultimately be amended or deleted from the plan even though they may not have been the subject of a representation at deposit stage (or be retained despite generating substantial objection)'*.

4.00 Limited weight should be given to the allocation of the site in the Council's draft LDP for reasons including:

- population projections from Welsh Government and the recent Barton Willmore study (see attached previously) show a significant fall in housing demand throwing into doubt the basis of the housing demand figures on which the site's allocation is predicated;
- objections by Welsh Government (letter to VoG Dec 20 2013) to the allocation of sites in rural villages under **B1. Scale and Location of Growth – Flexibility and spatial strategy**. In relation to B1, Welsh Government argues that this goes to the heart of the soundness of the LDP and comments on the potential weaknesses of an approach to sustainability that allocates large scale housing in villages without adequate services. It seems strange indeed that in terms of sustainability, the LDP proposes less housing in Barry and Penarth and more in rural villages.
- **Vale Villages Together Network has objected to the Council's proposal in its LDP to abolish the settlement boundaries around 24 Vale villages. This organisation and others are asking for this policy to be reversed. This goes to the heart of the planning policy for rural areas and aligns with the major concerns expressed by the Welsh Government.**
- Welsh Government asserts (**C4. Best and Most Versatile Agricultural Land**) that insufficient evidence is provided in the plan as to the need for the use of the best and most versatile agricultural land. The site contains 84 per cent of high grade agricultural land.
- Welsh Government point to inadequate sewage infrastructure to support housing delivery. While Redrow does not consider the sewage issue to be a barrier to development it is clear that the Colwinston Pumping Station is already at capacity and the age and the ability of the system to cater for a 40 percent increase is questionable. For example the age and quality of the pumps and the 50 mm pipe taking effluent to Llysworney and onto Cowbridge is considered inadequate by Welsh Water operatives we spoke to on site. It is

very unclear how the sewage constraints/potential increased liabilities are to be met. ***What is clear is that the Planning Inspector at the Primrose Hill appeal (APP/Z6950/A/14/2213031) shared the Council's and DCWW major concerns about the overload of the waste water treatment works. This concern is directly applicable to resident's concerns on the Redrow application for Colwinston and needs to be a clear material infrastructure consideration in line with existing adopted UDP policies.***

5.00 It would therefore be unsound to grant a planning consent based on a possible allocation in a LDP when there are significant objections of substance in relation to housing allocations in rural areas and some way to go before an Inspector assesses whether the LDP is even sound. ***Indeed the Inspector in his Primrose Hill appeal decision indicted the high overall level of concerns expressed by stakeholders in relation to the current LDP when he commented.....***

'...the deposit draft Local Development Plan was published in November 2013 but has been subject to a large number of objections on housing allocations. It is not anticipated that it will be adopted until about 2 years time'

6.00 Planning Policy Wales's guidance states '*Questions of prematurity may arise where an LDP is in preparation but the plan has not yet been adopted. In these circumstances refusing planning permission on grounds of prematurity may be justifiable in respect of development proposals which are individually so substantial, or whose cumulative effect would be so significant, that to grant permission would predetermine decisions about the scale, location or phasing of new development which ought properly to be taken in the LDP context. Refusal will therefore not usually be justified except in cases where a development proposal goes to the heart of a plan. This requires careful judgement. A refusal might be justifiable where a proposal would have a significant impact on an important settlement, or on a substantial area, with an identifiable character, but is rarely justifiable if a development proposal is likely to impact upon only a small area.'*

7.00 As indicated above, Welsh Government has significant concerns over the spatial distribution of new houses and again as indicated above, housing demand projections have fallen. Added to this, the Community Council and local residents have expressed strong objections to the allocation of the site. To allow development in advance of an opportunity for the spatial distribution policy in the western vale plus the allocation of a major site for 65 houses to be debated and analysed at an Examination In Public would not pass the test of natural justice and fairness. As part of such an examination, the Community Council would want to seriously challenge the scale of increase of housing proposed. The draft LDP allocation of 65 houses would be an increase of 42 per cent of the village's housing. The proposal for a small rural village to see such a dramatic increase through a planning application rather than the LDP process appears totally unbalanced. ***This view is supported by Vale***

Villages Together Network referred to in section 4.00 above. The Community Council councillors, as community leaders and place shapers are not against new housing. Rather they favour smaller scale organic growth appropriate to the scale and service provision of the village. Development of the scale proposed with limited affordable housing provision would do little for meeting local needs. The Community Council through the LDP process would want to be part of a mature discussion that considered housing growth in the range of 15 -20 houses in infill locations such as ASN 15 opposite St David's School. Growth of the village by some 10 -15 percent over the plan period would much more closely match service provision, infrastructure capacity and the historic growth of the village.

8.00 Housing land supply in the Vale of Glamorgan has significantly improved since the October 2013 Joint Housing Land Availability Study (JHLAS). It now stands at 7.3 years supply of available housing land and therefore well above the required 5 year WG requirement. The Primrose Hill appeal decision (APP/Z6950/A/14/2213031) issued on Oct 31 2014 also accepted the methodology for calculation and this is no longer a reason that the applicants should rely on to 'torpedo' the JHLAS. Indeed the Inspectors' decision on Primrose Hill includes the following statement

'Thus the JHLAS, the accepted means of assessing the availability of designated housing land, indicates there is an ample supply of land. And 'On this basis there is no need to use non-allocated land in order to meet housing need'.

This plus the decreased demand for housing as demonstrated by the Barton Willmore figures shows that there is no overriding imperative for the large scale Redrow site to be approved.

9.00 Notwithstanding planning policy considerations, development must meet normal development management criteria and statutory advice. As is demonstrated by consultant advice procured by the Community Council and included in the original objection, in relation to highways, conservation area, flooding and agricultural land quality – the development does not meet the tests laid down in PPG Wales, circular advice in relation to the preservation and enhancement of Conservation Areas and ENV policies in the UDP.

10.00 Accordingly the Council should refuse the application for reasons including;

1) It would be contrary to the policy principle against development outside the defined settlement boundary;

2) It would be contrary to the aims and objectives of the emerging Local Development Plan, would pre-determine decisions about the location, scale and phasing of new development which ought properly to be taken in the context of the emerging LDP, and would therefore be premature pending the

adoption of the LDP, as well as having an adverse impact on the setting of the village of Colwinstone;

3) It would adversely affect the character, scale and appearance of the village and would not preserve or enhance the special qualities of the Conservation Area;

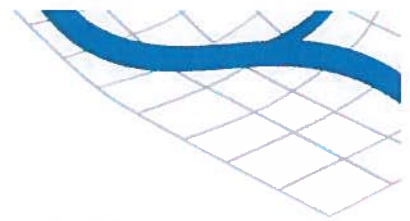
4) It would overload the public wastewater treatment works; and

5) would increase the incidence of local flooding.

R C Hathaway BSc Hons, Dip TP, MRTPI

On behalf of Colwinston Community Council

April 17 2014 and ***amended Dec 28 2014***



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Response to the Revised Drainage Strategy for the Proposed Development at Colwinston (2014/00242/FUL) on Behalf of Colwinston Community Council

Harvey J.E. Rodda *BSc, PhD, FRGS*
Director of Hydrology

F. Julian Smith *BSc MSc CEng MICE MCIWEM C.WEM*
Consultant Hydrologist

29th December 2014

Background

Hydro-GIS Ltd was engaged by Mr Rob Hathaway of Planr Ltd on behalf of Colwinston Community Council to review the revised drainage strategy as part of a planning application submitted by Redrow Homes for the development of land to the rear of St David's Primary School, Colwinston. The drainage strategy was dated September 2014 available from the Vale of Glamorgan website in December 2014. It represents a revision to the original drainage strategy, also reviewed by Hydro-GIS Ltd in April 2014. This short report provides a review of the revised drainage strategy in terms of dealing with the risk of flooding at the site and in particular discusses additional material which has been presented.

Submitted Document

The revised drainage strategy document consists of 66 pages, 12 pages of text and 54 pages of 10 appendices as follows:

- *Appendix 1:* Engineering layout as a 1 page colour drawing;
- *Appendix B:* Longitudinal section as a 1 page colour drawing;
- *Appendix C:* Site investigation permeability tests undertaken by Integral Geotechnique including a 2 page letter, 8 pages of test results and a 1 page map;

- *Appendix D:* Infiltration basin Micro Drainage calculations with 4 pages of output from the Micro Drainage computer software;
- *Appendix E:* Pre development catchment flows as a 1 page of output from the Micro Drainage computer software;
- *Appendix F:* Existing flood routing plan (1 page colour drawing)
- *Appendix G:* Post development catchment flows as a 1 page output from the Micro Drainage software:
- *Appendix H:* Proposed flood routing plan (1 page colour drawing);
- *Appendix I:* Infiltration basin Micro Drainage calculations as 20 pages of output from the Micro Drainage software:
- *Appendix J:* Welsh water sewer records as a 2 page letter and 1 page map.

Review of the Revised Drainage Strategy

The original submitted drainage strategy was criticised for lacking in any background information on the site location, topography, geology, hydrology and historical flooding. This is information which is essential for presenting an adequate assessment of the risk of flooding at a development site. The revised drainage strategy does not provide any additional information on these aspects and there is still no proper maps showing the site location and surrounding landscape. This raises the question as to whether the applicant is deliberately avoiding presenting such information as a larger map of the surrounding area would clearly show the site in a valley and geology maps from the British Geological Survey (BGS 2014) show the presence of alluvium, which demonstrate it is an area where water has flowed.

The revised report includes some information on the hydrology in that it identifies the area to be prone to surface water flooding and even provides an estimate of the catchment area as 73 ha (0.73 km²) is given. An initial inspection of the 1:25,000 map for the area would suggest a slightly larger area draining to the development site of 1.06 km² (Figure 1). Since no map of the catchment is presented in the revised drainage strategy nor the source of the information used to derive the catchment area, this value of 0.73 km² must be questioned.

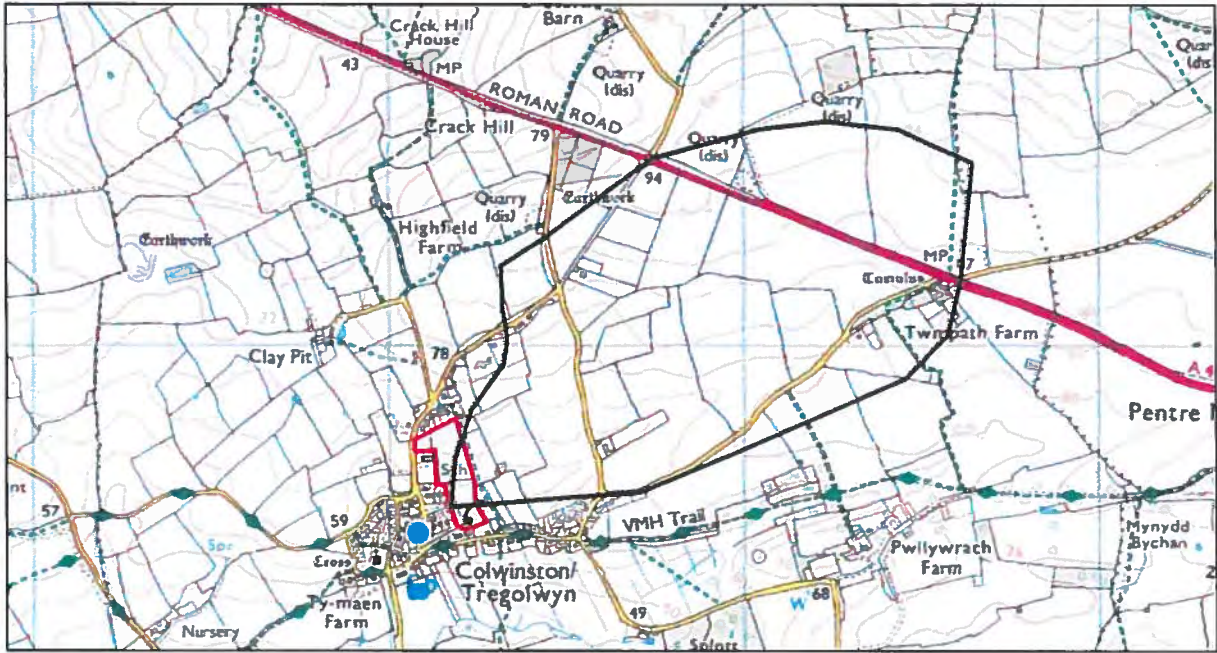


Figure 1. The catchment area (black) draining to the site (red) based on a 1:25,000 scale base map.

Greenfield (pre-development) flows for different return periods are presented which have been estimated using the IH Report 124 methodology for the 0.73 km² catchment. This method is known to be a significant underestimate (Rodda, 2012) and different methods for the development site greenfield flows should have been used given that the area is moderately sloping and the IH 124 method does not consider the influence of slope (i.e. the flow from a steeply sloping catchment would be exactly the same as that from a gentle sloping catchment). Alternative estimates using the Flood Estimation Handbook (FEH – Institute of Hydrology 1999), which is the standard approved method for estimating floods in the UK, and the ADAS 345 method (ADAS, 1981), both of which include the influence of slope are given in Table 1 for the development site catchment. This supports the IH 124 method as a significant underestimate.

The magnitude of the IH 124 estimates presented in the revised drainage strategy should be compared with the flooding which has frequently occurred at this site. For a flow of 100 l/s an area 1m wide and 0.1m deep needs to be flowing at 1m/s. This is not a significant amount of water and probably not even the magnitude of the flow photographed in the field and presented in the review of the original drainage strategy. To think that 106 l/s represents a value which would be exceeded on average just once every 100 years, this is hardly a significant volume of water. The frequent flooding of the site would support the 1 in 100 year flows to be closer to the ADAS and FEH estimates.

Area (km ²)	Flows (l/s)		
	IH 124	ADAS	FEH
0.73	106	606	1020
1.06	149	882	1470

Another weakness of the IH 124 method is that it does not give a duration for the flow, just a single peak flow, so it is not possible to calculate the total flow volume. The FEH estimates

are also presented as a flood hydrograph over a specified storm duration making it possible to calculate a total flow volume which can then be used for the design of storage volumes for drainage systems.

Published maps from the Environment Agency on the risk of surface water flooding also show an area of high risk and a flow pathway identified through the development site (Figure 2). Again this is information which the applicant has failed to provide as it is showing a heightened risk of flooding at the site compared to their assessment.

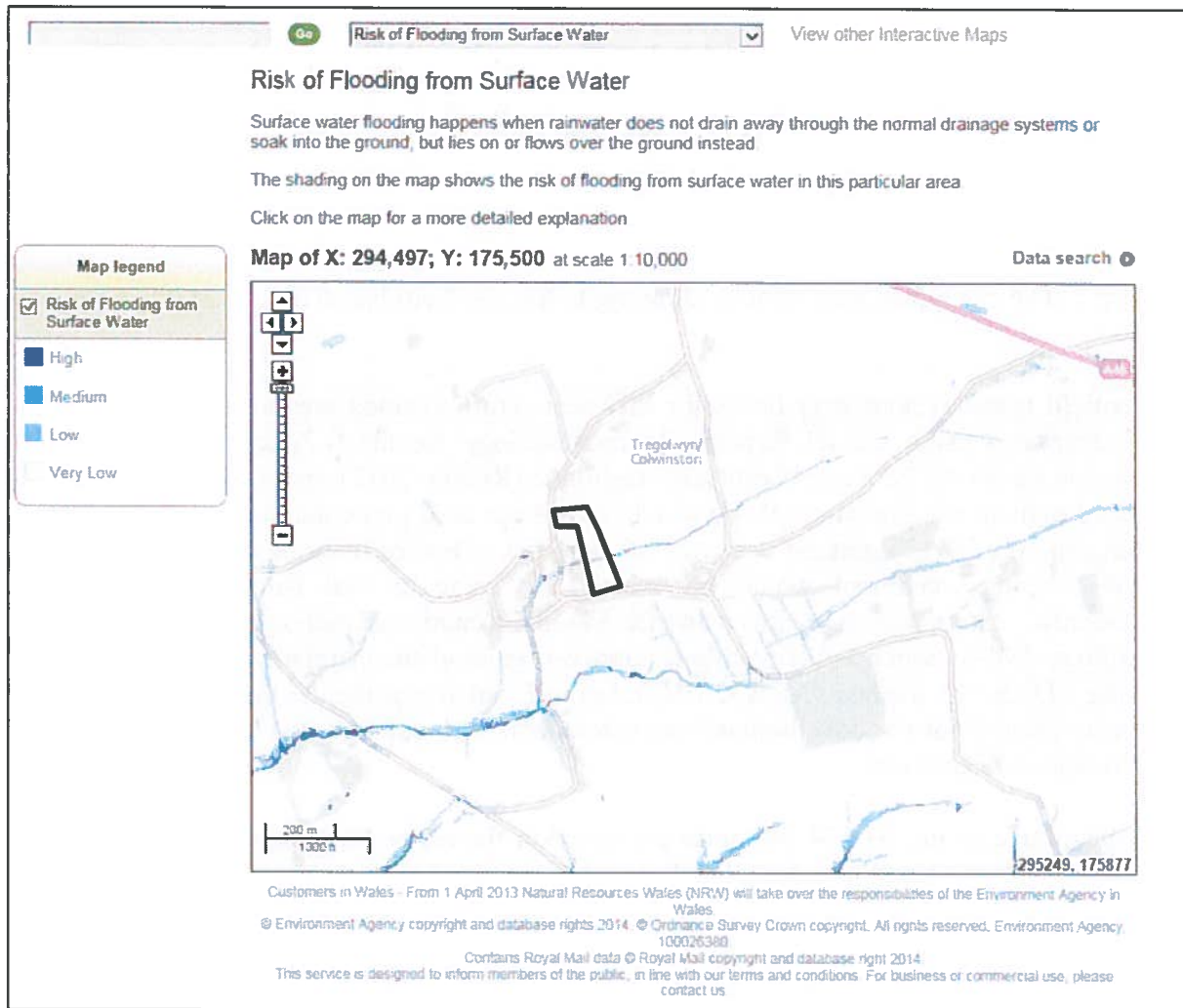


Figure 2. Environment Agency surface water flood risk maps showing the approximate site location in black.

More details are provided as to how the drainage strategy will prevent the flooding of the site and neighbouring properties. Essentially all of the surface runoff from the new impermeable surfaces of the development and the existing flows will be conveyed into an infiltration basin and the water allowed to infiltrate into the permeable underlying strata. Few details of this design are given in the text apart from the ground levels and the location of the basin is shown in drawings. The volume of the infiltration basin is not provided in the text and just

mentioned as 420 m³ on one of the drawings. The overall drainage design including the infiltration basin is tested using the Micro Drainage software and presented as pages of printouts from this software without a proper written explanation. The applicant should have a simple description in terms of the overall volume of water flowing into the basin and that which is leaving the system through infiltration. As there is no adequate explanation of the Micro Drainage output, there are serious doubts as to whether the drainage design can properly alleviate the existing flooding and also accommodate the additional surface runoff from the development. One observation of the Micro Drainage output is that it has used rainfall from the Flood Studies Report. This was a report published in 1975 and techniques and data from this were used as the standard approach for flood estimation in the UK until 1999 when it was replaced by the FEH. The Micro Drainage simulations should use the more up-to-date FEH rainfall estimates as input.

Issues Relating to the Performance of the Infiltration Basin

The FEH-CDROM (Version 3) shows an SPRHOST (Standard Percentage Runoff) of 17.64% for the area upstream of the proposed development which normally indicates highly permeable geology. This is consistent with the permeable soils reported in the Drainage Strategy. However the geological details reported also show a very hard limestone stratum only 1m below existing ground level (trial pit SA2 in Integral Geotechnique's report). The permeability which matters for the performance of the basin is the overall permeability of the surrounding geological structures and clearly the vertical permeability of the base of the basin will be substantially less than the locally measured soil permeability, due to the solid rock stratum below.

The FEH-CDROM (Version 3) shows a SAAR (annual average rainfall) of 1118mm for the area. The potential evaporation rate is unlikely to exceed 600mm. This indicates that any depression without positive drainage provision is likely to retain standing water over much of the year, even without inflow from elsewhere.

Local observations of overland flow reported in "Colwinston News" (issue No. 9 from Feb. 1995; issue No. 55 from Dec. 1998), together with observations of ponded water in the area of the proposed infiltration basin already notified by the Community Council, confirm that the proposed infiltration basin is likely to be full of water on a regular basis and thus frequently ineffective as a runoff control measure. When the basin is full, the increased runoff from the newly urbanised area will pass uncontrolled into the area downstream clearly leading to a detriment to the downstream flood risk.

The observed underlying solid geology is consistent with sustained local perched groundwater levels leading to excessive infiltration into the sewer system in the area downstream, as considered to be a risk in our initial assessment.

The updated flood strategy accepts that the proposed basin will be overtopped in flood events of less than 1 in 20 years return period. Under existing conditions it is acknowledged that flood water will be expected to pass unobstructed. However, this is relatively healthy water, being chiefly runoff from agricultural land plus flow passing through the permeable geology. If the proposed development is carried out, the new foul drainage will also flow towards the infiltration basin and it is at times of flood when foul water pumping systems become overloaded and/or fail to operate properly, leading to sewage spills. Downstream property

currently at risk from surface water flooding would therefore, in future, also be at risk of flooding by contaminated water

Increased infiltration encouraged by the basin could give rise to increasingly sustained perched groundwater levels in the area immediately downstream from the development giving rise to increased potential for groundwater flooding in that area.

Summary

Overall the Revised Drainage Strategy report is still inadequate, poorly written and lacking in much important information as has been outlined in the review of the original drainage strategy. A summary of the main points in our review of the revised document is shown below:

- An estimate of the natural catchment area at the site is given as 0.73 km², information from OS maps shows this to be an underestimate;
- The IH Report 124 method has been used to estimate greenfield flows from the site, this method has been shown to be a considerable underestimate of the current flood risk at the site;
- Environment Agency maps of surface water flood risk support the risk of flooding at the site;
- No proper written description of the drainage strategy nor its testing using the Micro Drainage software is provided, therefore the performance of the system is questionable;
- The Micro Drainage software used rainfall data as input from the 1970s, estimates which have since been replaced for flood estimation in the UK;
- There is a substantial risk that the infiltration basin will not perform as intended due to being full of water on a regular basis and it will definitely not attenuate surface water runoff from the development at return periods even less than 1 in 20 years.
- The drainage arrangement will increase the risk of sewage contaminated flooding to properties downstream from the development.
- There is potential for increased infiltration at the site leading to groundwater flooding downstream.

References

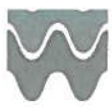
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Institute of Hydrology (IH) 1999. Flood Estimation Handbook, Wallingford, Oxfordshire.

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Dŵr Cymru
Welsh Water

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CF30 0EH



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Mr. Robert Lankshear
Planning Department
Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

Date: 6th January 2015
Our Ref: PLA0005984

Issued via email only

Dear Mr Lankshear

Site: Land to the rear of St David's Primary School, Colwinston

Development: Development of 64 residential dwellings, open space, sustainable urban drainage, vehicular and pedestrian accesses, landscaping and related infrastructure and engineering works

I refer to recent correspondence regarding the current planning application for 64 residential properties at Land to the rear of St. David's Primary School, Colwinston. As you will be aware, the foul discharges from the development would drain to our Cowbridge Waste water Treatment Works (WwTW) which is currently overloaded and cannot accept any further flows until improvement works are undertaken. I am mindful that at present our position on the application is an objection, based on the impact of the proposal upon the receiving Cowbridge Treatment Works. .

In light of our concerns regarding the impact of the development, the developer commissioned a Feasibility Study of Cowbridge WwTW to identify a solution to accommodate the flows from the site. A viable/deliverable solution has since been provided to the developer.

The most appropriate mechanism for securing the funding to deliver this solution at the WwTW is via a S106 Planning Obligation Agreement, of which Dŵr Cymru would be a signatory. Accordingly, subject to appropriate controls contained with a S106 Agreement which ensures the completion of the solution in advance of the communication of flows to the public sewerage network, we are content to remove our objection to this planning application.

I trust that this information provides certainty and commitment that there is a viable/deliverable scheme to accommodate the development at the WwTW. Accordingly, should the Local Authority be minded to grant consent for this development I would welcome further discussions on the content of any related legal agreement.

Yours faithfully,

Owain George
Lead Development Control Officer
Developer Services



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Alun Cairns MP
Vale of Glamorgan



HOUSE OF COMMONS
LONDON SW1A 0AA

Mr M Petherick
Cabinet Officer
Vale of Glamorgan Council
Civic Offices
Holton Road
Barry
CF63 4RU

17 April 2014

Ref: VoG

Dear Mark

Planning Application No: 2014/00242/FUL

Proposal: Development of 62 residential dwellings, open space, sustainable urban drainage, vehicular and pedestrian accesses, landscaping and related infrastructure and engineering works.

My purpose in writing to object to the above planning application which, if given, will have a devastating effect on the community of Colwinston.

Under the current Unitary Development Plan, the intended application site is outside the settlement boundary of Colwinston, and if granted, will represent a substantial residential intrusion into the countryside that is contrary to policies ENV 1, Hous 3 and Hous 5 – it must also be stated that the application site has not been identified for residential purposes under the UDP and is ultimately contrary to policy Hous 1 and Hous 2, as its proposed design cannot be argued as 'rounding off' the village of Colwinston.

As you can appreciate, I have received several complaints about this application, with many residents concerned not only about the impact that such a development will have on already pre-existing flooding issues within the village but also on the negative impact it will have on the adjacent conservation zone.

It is nonetheless a concern of mine that any further development should not exasperate these issues, and I would question whether or not this proposal is contrary to policy ENV 7 and ENV 20.

Finally, I understand that this application site has been identified as a possible development site under the Authority's new Local Development Plan, but as this has not been adopted yet by the Council, it cannot be taken into account. It must also be noted that under the 'Alternative Site' consultation that is currently being undertaken, there is a proposal to remove this area from the Local Development Plan.

29 High Street
Barry
CF62 7EB

Alun Cairns MP
www.aluncairns.co.uk
alun.cairns.mp@parliament.uk
☎ 0207 219 5232 ☎ 01446 403814

29 Y Stryd Fawr
Y Barri
CF62 7EB

Alun Cairns MP
Vale of Glamorgan



HOUSE OF COMMONS
LONDON SW1A 0AA

There is a considerable process still left before the LDP is completed and I am aware of significant objections to the allocation of the site to which the Welsh Government's inspector will want to consider.

I am also aware that Colwinston, as a community, is not opposed to the gradual expansion of the village. This is how the community has developed over generations – in continuing in such a way, I believe that appropriate numbers of new dwellings can help contribute to the Authority's target, meet the needs of the immediate community, and protect the nature and character of the village.

Thank you for your consideration in this matter and I look forward to hearing from you as soon as possible.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Alun Cairns'.

ALUN CAIRNS MP
Vale of Glamorgan

29 High Street
Barry
CF62 7EB

Alun Cairns MP
www.aluncairns.co.uk
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Cynulliad Cenedlaethol Cymru
Bae Caerdydd
Caerdydd CF99 1NA
www.cynulliadcymru.org

National Assembly for Wales
Cardiff Bay
Cardiff CF99 1NA
www.assemblywales.org

Ref: JH/KH
Mark Petherick
Civic Office
Vale Of Glamorgan
Civic Offices
Holton Rd
Barry



3 April 2014

Re: Colwinston Pumping Station

Dear Lis

I have recently been contacted by Colwinston Community Council. They are concerned about the effect on the about the local pumping station of a recently submitted planning application. They are fearful the pump is inadequate and that pollution may result.

This issue has become more urgent with the submission of a planning application by Redrow to develop the area and build 62 houses. The application as you will know is currently with the Planning Department.

The Community Council are concerned about two statements made by Welsh Water which they find contradictory. In the Vale of Glamorgan Deposit Local Development Plan 2011-2026 comments from Welsh Water page 180-181 quote:

“Dwr Cymru Welsh Water (DCWW) has advised that the site falls within the Llantwit Major water supply network which is at the extremity of its capability. Extensive improvements would be required and consultation with DCWW will be required to determine whether improvements to this network will be required. A 150mm diameter sewer crosses the northern part of the site which may restrict the amount of density proposed as protection measures in the form of easement width or diversion of the sewer will be required. The Cowbridge Waste Water Treatment Works has limited capacity to accommodate any new development and consultation with DCWW will be necessary to determine whether improvements to this facility will be required.”

Bae Caerdydd
Caerdydd
CF99 1NA
Cardiff Bay
Cardiff
CF99 1NA

Ffôn / Tel: 029 20 898469
E-bost / Email: jane.hutt@wales.gov.uk

This seems to contradict a letter sent by Welsh water to Redrow in which it is stated
"The public sewerage system in the vicinity of the proposed site is generally of a separate type.

The foul only flows from the proposed development can be accommodated within the public sewerage network."

I am aware that the Local development Plan has not been finalised and there is concern in the local area that the developers are trying to get approval before the plan is finalised although I realise that you can do little about this.

I would be grateful to know if you have been made aware of the apparent change of mind on this issue by Welsh Water.

With very best wishes

Yours sincerely

A handwritten signature in black ink that reads "Jane". The signature is written in a cursive style with a large, stylized 'J' and 'a'.

JANE HUTT AM VALE OF GLAMORGAN

D

Ty Collen
Colwinston
Cowbridge
CF71 7NL

01656 648515

14th April 2014

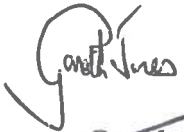
Robert Landseer
Planning Officer
Vale of Glamorgan Planning Department
Barry Docks

Dear Sir

Re: Planning Application 2014/00242/FUL

Please find enclosed a Petition from the villagers of Colwinston with 195 signatures objecting to the above planning application on the grounds stated on each page of the petition.

Yours sincerely



Gareth A Jones LL.M. LL.B (Hons)

D.E.E.R
RECEIVED
ACTION BY: <i>IRRL</i>
NO: <i>P488</i>
ACK: <i>16/4/14</i>

RECEIVED

15 APR 2014

ENVIRONMENTAL
AND ECONOMIC
REGENERATION

gareth606@aol.com

PA.103

83

O'Keefe, Kevin T

From: Lankshear, Robert F
Sent: 05 January 2015 09:39
To: Planning & Transportation (Customer Care)
Subject: FW: Planning Application 2014/00242/FUL

Please log and print the attached

Robert Lankshear
Senior Planner
Planning and Transportation Services
Vale of Glamorgan Council / Cyngor Bro Morgannwg tel / ffôn: 01446 704659 e-mail / e-bost:
rflankshear@valeofglamorgan.gov.uk

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

Consider the environment. Please don't print this e-mail unless you really need to.
Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.

-----Original Message-----

From: Brian Kennard [<mailto:brian.kennard@btinternet.com>]
Sent: 03 January 2015 20:02
To: Lankshear, Robert F
Subject: Planning Application 2014/00242/FUL

D.E.E.R
RECEIVED
ACTION BY: IR RL.
NO: 4
ACK:

RECEIVED
05 JAN 2015
ENVIRONMENTAL
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Dear Robert

Planning Application 2014/00242/FUL
Development on Land to the Rear of St David's School, Colwinston

I should be grateful if you would accept this email letter as an additional formal objection to the above planning application to that which I submitted in April 2014.

Since then Redrow has recently submitted an amended application presumably to take account of previous planning objections but in fact it does no such thing. Changes to house finishes, a larger and deeper infiltration basin (see comment below) and the addition of a piece of art work and a couple of bench seats in the grounds does nothing to deal with the important planning issues that have already been raised.

In the meantime there have been a number of changes during the past year which are relevant to the planning application. Firstly the supply of housing land has more than surpassed the 5 year target and can no longer be used by Redrow as a "material consideration" to bulldoze through an otherwise totally unacceptable planning application before the Welsh Government Inspectorate has had a chance to consider the revised LDP.

Secondly Redrow and DWW spent weeks during the summer attempting to trace where surface water was entering sewer pipes which in turn leads to discharges of sewerage from the attenuation tank at the local pumping station. They found nothing but tried to stop the problem by relining some of the pipes close to the pumping station. This clearly has not worked as there have been two discharges of sewage since that work was completed. I understand Natural Resources Wales has insisted that DWW resolve this problem before withdrawing their objections to the development going ahead.

Similarly there is the flood risk and drainage problem where Redrow has submitted an amended drainage strategy. However expert drainage consultants have looked at this and stated that it will do nothing to deal with this problem as the underlying rock structure will not allow sufficient drainage through the infiltration basin. The basin will become full during long periods and overflow after heavy rain on a regular basis.

This would leave us with a basin which is a health and safety hazard (accepted by Redrow in their own Report) where someone might drown when it is full and also create an area of stagnant water as a general health risk. Bearing in mind the basin is situated within the proposed housing estate itself and in very close proximity to a school of some 150 children is this an unworkable strategy worth pursuing?

As to the school itself - the main reason why the site appeared on the new LDP in the first place - it has introduced a nursery section which, together with a higher normal intake than previously estimated, would leave little room for a significant influx from the proposed housing estate to bring it up to standard numbers for the size of the school.

These additional points together with those outstanding problems in relation to traffic congestion and safety issues, high carbon travel, lack of infrastructure, loss of BMV agricultural land and an adverse effect on a designated Conservation Area would surely mean this planning application should be refused. A decision I would fully endorse.

Yours sincerely

Brian Kennard
'Trewirgie', Colwinston

6

O'Keefe, Kevin T

From: Nigel Pollard [NigelPollard@harvest-agency.co.uk]
Sent: 27 March 2014 09:05
To: Planning & Transportation (Customer Care)
Cc: pollard-nigel@sky.com
Subject: Re: Planning application for building 62 houses on land to rear of St David's School, Colwinston. Planning application No.2014/00242/Ful
Attachments: Vale of Glam - Planning 270314.PDF

Dear Sirs,

Re: Planning application No.2014/00242/Ful
Location: Land to the rear of St david's School.
Proposal: Residential development of 62 houses.

My wife and I are extremely concerned about this application as if approved it would have a devastating effect on the village, increasing its size by 40%. The village infrastructure will just not cope with this, especially the drainage and sewerage system which are currently running to capacity. Furthermore the proposed site lies in a Flood Zone A and there are recognised regular local flood occurrences caused by surface water drainage problems along the Heol Faen Valley. This large-scale development would greatly increase the amount of surface water run off and only make matters worse. Again this is contrary to Policies MD1 and MD8. Rather than go into further details of our concerns in this email, please find attached our letter (also sent by post today), outlining our concerns and objections.

We can only hope you will give our concerns and objections proper consideration and hope you reach the conclusion that the proposed site is totally inappropriate for such a development.

Yours sincerely,

Nigel and Karen Pollard
 6 Beech Park, Colwinston. CF71 7NH.

D.E.E.R
RECEIVED
ACTION BY JMC RL
NO: P605
ACK: 27/3/14.

RECEIVED

27 MAR 2014

ENVIRONMENTAL
 AND ECONOMIC
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(5)

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

27th March 2014

6 Beech Park.
Colwinston.
Vale of Glamorgan.
CF71 7NH.

For the attention of Case Officer – Mr Robert Lankshear.

Dear Sir,

Re: Planning application No.2014/00242/Ful
Location: Land to the rear of St david's School.
Proposal: Residential development of 62 houses.

I refer to the above proposed development to build 62 residential houses of varying sizes. I would like to register our concerns as to the viability of the scheme, thinking particularly of the village's limited facilities and its very poor drainage. You must certainly be aware of the severe flooding problems in the lower village in recent times. Which involved several houses being flooded and the emergency services being involved, not to mention the Environmental Agency and Welsh Water. The main issues which allowed this flooding have not been addressed at all and this proposal is only likely to greatly exacerbate this situation. Not only that, but the actual site of the proposed development would be in the actual regularly flooded fields. On this particular point we understand that the village as a whole was informed by Welsh Water after the most recent flooding that if any further developments took place in the village which put further strains on the current (insufficient) drainage facilities, an upgrade estimated to cost in the region of £18m would be required. Whilst we note the Redrow proposal mentions an 'infiltration basin' designed to cope with this problem, Redrow very noticeably DO NOT guarantee it will eradicate the problem! With the significant increase in run off caused by the development, we think the problem will only be exacerbated and merely leave a permanent waterlogged boggy area which could result in significant health hazard issues.

To be more specific with our objections to the proposal please see and seriously consider the point we raise under the following heading.

Drainage and Sewerage

Utility services are already working to capacity in the village and drainage and sewerage is failing. Welsh Water has in the past indicated that any further significant development would require major improvements to the existing system. This development would run contrary to planning policies MD1 in avoiding areas of flood risk and MD8 in relation to both flooding and pollution risks.

The site lies in a Flood Zone A and there are recognised regular local flood occurrences caused by surface water drainage problems along the Heol Faen Valley. This large-scale development would greatly increase the amount of surface water run off and only make matters worse. Again this is contrary to Policies MD1 and MD8.

Redrow do not guarantee that the 'infiltration basin' designed to cope with this problem will eradicate it and, in view of the significant increase in run off caused by the development, we think the problem will only be exacerbated and merely leave a permanent waterlogged boggy area which in itself could raise health hazard issues.

Community infrastructure

There is no scheduled bus service in the village and the nearest public transport is over a kilometre away on the main A48 road. Local planning objectives and Policy SP7 are designed to reduce the need to travel and Policy MD1 promotes the need for sustainable travel.

Other than the School, Church, Pub and Village Hall there are no other services or facilities in the village. Certainly no 'General Stores' as Redrow mistakenly mention in their submission! To find other facilities we must travel 5-8 kilometres.

Highways and Traffic

Due to the lack of facilities and services in the village, and there being no local bus service, most families run two cars. This would see an increase in the number of cars from the development of 100 plus and the number of daily journeys in and out of the village by some 200 or so. This would be contrary to local planning objectives and Policies SP7, MD1, MD4 and MD3 (8) regarding renewable and low carbon energy use.

This leads to road safety issues in conjunction with existing traffic problems at the school where access to the site is immediately next to the school entrance to the south and facing a sharp bend in the lane to the north for access to the A48 road. Widening of these lanes and improvements to the junction at the top of Crack Hill will be needed. Policy MD3 (9) states new developments should have no unacceptable impact on highway safety and not cause or exacerbate existing traffic congestion.

Education

St David's Church in Wales Primary School only has limited capacity and, with no available land to expand, would find it difficult to cope with possibly some 100 additional children stemming from the proposed housing development. It would lead to unacceptable reduction of recreation and amenity space and overcrowded classrooms. Local planning objectives seek to ensure that new housing development does not impose undue pressure on schools.

Housing Need

The local housing need is minimal and substantially less than 62 houses. Local planning objectives and Policies MD1 and MD2 direct new development to sustainable locations to support the needs of the local community.

Biodiversity

There are biodiversity issues regarding the loss of good agricultural land currently used for rearing horses but could equally be used for grazing sheep and cattle. It provides a habitat for birds (including a pair of breeding red kites), butterflies, bats and other animals. Red kites and bats are both protected species. Planning Policy MD6 states the loss of open space and 'paddocks' would not be acceptable and other planning objectives are to use lands effectively and efficiently and to sustain and manage natural resources.

Location and Conservation

An increase in the size of the village by some 40% is completely out of scale and would have an adverse effect on the character and integrity of the village and Conservation Area. In so doing it would breach many national planning policies in relation to building within rural settlement and close to a Conservation Area and also a large number of local planning objectives and policies. The Conservation Area Appraisal and Management Plan (CAAMP)2009, Welsh Government Planning Policies HOUS2 and HOUS8, Planning Policies MD2, 3 and 11 and, in particular Policy MD6 concerning development within minor rural settlements, would all be compromised.

It would turn Colwinston from a small peaceful village into a commuter hub for Cardiff, Bridgend and elsewhere. We note following the consultation period for the current Local Development Plan, 5 alternative sites within the village have been submitted and registered on the Vale Council website! These include one from Redrow themselves extending the current site into the adjacent 3 fields and the re-emergence of the Waterton Lodge site.

We feel this location for such a large development appears to be totally inappropriate. 62 new houses will increase the size of village enormously and will be an even greater burden on the very limited local facilities. The site proximity to the local primary school, with additional traffic, especially heavy plant / materials traffic during the build would result in an increased (and in our opinion totally foreseeable) danger to the children.

Traffic and the very poor road upkeep / condition are already a huge issue in the village and again this development would only make matter worse.

As we have mentioned before Beech Park has been seriously affected by flooding in recent times and the proposed site for this developments appears to be in a totally inappropriate location. We would further comment that the actual houses themselves appear to be completely out of keeping with the rest of the village, as there are extremely few, if any 'Brick-faced' building in the village!

In general we are of the opinion that existing 'Brownfield' sites in the 'Vale' should be investigated for development before any precious 'Greenfield' sites are considered.

Hopefully the council will have the wisdom to see the size of this proposed development will have a very serious knock-on effect to the community and is not suitable to be built in this location.

Therefore my wife and I would like to register our formal concerns and objections to the proposed new build and would request to be kept advised of any future progression / time plan regarding the proposal.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Nigel and Karen Pollard', followed by the printed name 'K.A. Pollard'.

Nigel and Karen Pollard.

D.E.E.R
RECEIVED
ACTION BY: IRRL
NO: PS16
A.CK:

RECEIVED

16 APR 2014

ENVIRONMENTAL
AND ECONOMIC
REGENERATION

Village Farm House, ①
Colwinston
Vale of Glam
CF71 7NE

To whom it may concern:

Planning Application No: 2014/00242/FUL

I would like to add my voice to the many in this village and object to this development. There are many grounds on which to make this objection including the following.

① Drainage + Sewerage.

The land floods at times of heavy rain + adds to the sewerage problems with run-off which would be exacerbated by further hard surfaces.

The current sewer is well known to Welsh Water already to be inadequate so additional housing would increase overflow into an already disgusting ditch full of sewage sediment.

② Roads.

The roads/lanes in this village are extremely narrow making it almost impossible for 2 cars to pass. The addition of possibly another 100+ cars, since there is no public transport

would be immensely hazardous particularly ²
at 2 points: ① exits onto the A48.
② by the school entrance.

There is a tight bend within 50mtrs of the
proposed site access which was a major given
for this site's rejection in 1988.

③ The proposed site would limit the very expansion
of the school which would need a size increase
to cope with additional children.

④ An increase of 40% in the size of the village
on what is prime agricultural land is
unnecessary. Such a plan goes against
many of the Vale Council's own objectives
& would have many detrimental effects on
the Conservation area.

There are many other issues including lack
of need of housing, lack of amenities etc.
All of which could be remedied by adopting
Llandow Newydd as a 'new town' and
remove the piecemeal destruction of many
Vale villages & the expense of conducting
inquiries.

Hester Tachewase (Mrs)

EG

Old School House Colwinston Cowbridge CF71 7NE

RECEIVED

09 APR 2014

ENVIRONMENTAL AND ECONOMIC REGENERATION

The Planning Office
Vale of Glamorgan Council
Docks Office
Barry
CF63 4 T

D.E.E.R
RECEIVED
ACTION BY: IR RL
NO: P301
ACK: 9/4/14

1^{sr} April 2014

Dear Sirs

Re: Planning application 2014/00242/FUL
Land to the rear of St David's School Colwinston

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

1. Minor rural settlement

Colwinston is a rural settlement in the Vale of Glamorgan dating back to pre-Norman times with a Grade 1 listed church built in 1111 at its heart. Some of the oldest houses in the Vale of the Glamorgan, several of which are listed, surround the church. These are the buildings which reflect the character of the village and its history and provide its identity. From the earliest times, building has taken the form of a ribbon development along the two roads that lead to the church and this has retained the character of the village..

2. Proximity to a Conservation Area

The major part of the village part of the village falls within the Conservation Area as defined by the Vale of Glamorgan Adopted Unitary Development Plan. In addition to listed buildings, there are also a number of buildings and sites of special interest/ancient monuments. Although the proposed development site falls outside the Conservation Area itself, it lies within close proximity and will overlook it. There is special mention in the UDP of the importance of maintaining openings and areas where the rural views can be enjoyed and remain unobstructed. This would no longer be the case if such a large scale development went ahead. The number of proposed dwellings will impact upon the historic character of the village. The proposed development would contravene local planning objectives and policies.

3. Transport

There is no bus service serving the village itself. The nearest bus stop lies on the busy A48, a mile from the proposed development. The majority of the inhabitants of Colwinston own two cars and some more than two. It would be envisaged that 60 new houses as proposed by Redrow would mean say 120 more cars arriving in and exiting the village each day, mostly at peak times. The lanes into the village are narrow. Two vehicles cannot pass. One vehicle has to slow down or stop on both the exit roads from the village to the A48. Due to the narrowness of the lanes during peak times, when children are dropped off at and collected from school and playgroup, a one way system has been in operation in the

village for a number of years so that all traffic is travelling in the same direction. This would mean cars leaving the proposed development at peak times would have to turn left and travel right through the village to exit onto the A48 causing a backlog of traffic and delays. Both turnings on to the A48 are dangerous because of the speed at which traffic travels on the A48 and have been the site of accidents in the past. The danger to children and dog-walkers is aggravated by the fact that there are no pavements either within the village or leading to the A48 and the bus stops. The number of cyclists, both children and adults, has increased recently and this trend is likely to continue. A marked increase in the number of vehicles with the danger of vehicles trying too fast will inevitably increase the likelihood of an accident. There is no footway for the children who walk to school and the bends and dips in the roads make it difficult to see far ahead. The school bus deposits the children in the morning and collects them in the afternoon outside the school and in addition, there are approximately 100 parents dropping off children. This occurs where the access to the proposed development is located.

4. Tourism

Colwinston is part of the ValeWays network and is visited by a large number of walkers, cyclists and horse riders particularly at weekends. At present, it is a pleasing rural settlement enjoying excellent views over countryside and over the Bristol Channel. The village has cottages for holiday lets within the boundary and a B&B on the outskirts both used by visitors to the area and is ideally suited for those wanting to visit the Glamorgan Heritage Coast and the Wales Coastal Path. Other local regenerative projects are raising the level of tourism in the area and improving the economy. A development on the scale envisaged would destroy the rural charm of the village and thereby undermine all the initiatives that have been taken to encourage tourism to the area.

5. Services

It has been established that Welsh Water will not connect any further properties to the mains resulting in any new properties having to rely on cesspits for sewerage. There is regularly a problem with surface water drainage in the area to the south and east of the proposed development resulting in localised flooding and this situation would only be exacerbated by further development in the village.

6. Agricultural land

Whilst Waterton Lodge and garden itself are designated for residential use, the fields to the south and east are agricultural land. The village has three working farms within its cartilage which provide a livelihood for those involved in what is predominantly an agricultural area and rural community. There are agricultural vehicles constantly passing through the village.

7. School

The village school has been extended on several occasions in the last twenty years to cater for additional numbers but it is near to capacity at present. It could only cater for a maximum of thirty more pupils. There is little room to extend the school. All the local schools are full to capacity. If 60 houses were developed, a new primary school would have to be built.

Finally, it must be emphasised that the application to build an additional 60 houses is out of all proportion to the current size of the village and would represent a 430% increase in the number of houses without any additional services or facilities. Such a development would destroy the rural nature of the village and its community.

Yours faithfully



PAMELA HAINES

23

Mr M Goldsworthy
The Vale of Glamorgan Council
Dock Office Barry docks
Barry
CF63 4RT

R W Gibb
Church Cottage
Colwinston
Cowbridge
Vale of Glamorgan
CF71 7NL
31/03/2014

Your Ref P/DC/RL/2014/00242/FUL

Dear Mr Goldsworthy,
I am writing regarding the proposal to build 62 dwellings in Colwinston.
I have several concerns regarding this proposal which are as follows;

Drainage and Sewerage

Welsh Water are struggling to cope with current demands on their sewage system. Very often the release excess sewage into the local stream which does cause a noxious smell and no doubt affects the fauna and flora. I walk past the sewage pumping station most days and very often the smell is of an unpleasant nature. Without substantial investment there is a high risk of serious pollution incidents occurring. We know they are at capacity because they have been reluctant to take on new houses in the recent past. The other issue is that the site lies in a flood zone which regularly floods; caused by surface water drainage problems along the Heol Faen Valley. Redrow cannot guarantee that the infiltration basin designed to cope with this problem will work. We will be monitoring the sewage release from the pumping station very closely and measuring the impact on the environment. There is a high risk of a serious pollution incident or flooding affecting properties downstream, as this has happened in the past. These proposed plans are contrary to policies MD1 and MD8.

Highways and Traffic

There is no provision to upgrade the lanes and with extra traffic, chaos will ensue. The area around the school is already congested at the start and finish of the school day. There is no provision for additional parking and indeed The entrance to the development is next to the school. This is a disaster waiting to happen with young children trying to dodge the traffic as they come and go from school. With no bus service in the village new residents are going to need cars to commute. Who is going to pay for widening the lanes and improvements to the junction at the top of Crack Hill, which will be required? All these are contrary to local planning objectives and policies SP7, MD1, MD4 and MD3.

Education

St David's Church in Wales Primary School has limited capacity with no available land to expand to cope with potential doubling of numbers. It would lead to an unacceptable reduction in recreation and amenity space and overcrowded classrooms.

D.E.E.R
RECEIVED
ACTION BY: IRRL
NO: P91
ACK: 2/4/14 PA.115

RECEIVED
02 APR 2014
ENVIRONMENTAL
AND ECONOMIC
REGENERATION

Agricultural Land

This proposal will take out grade 3 agricultural land, there is not much of this quality land in Wales. A report on climate change has concluded that the world will not be able to feed the population in a few years time. It would be irresponsible to build on green field sites when a massive brown field site at Llandow is available. Currently the fields are used for grazing horses and provide a habitat for birds, butterflies, bats and other mammals like dormice. Policy MD6 states that loss of open space and 'paddocks' would be unacceptable if other sites were more suited.

Location and Conservation

The proposal would increase the size of the village by some 40%, this is completely out of scale. This proposal is in breach of many national planning policies in relation to building within a rural settlement and close to a Conservation Area. The Conservation Area Appraisal and Management Plan (CAAMP)2009, Welsh Government Planning Policies HOUS2 and HOUS8, Planning Policies MD2, MD3 and MD11, in particular Policy MD6 would all be compromised. The local housing need is minimal and substantially less than 62 houses.

Yours Sincerely


Richard Gibb

Hard copy - original sent by computer.

as 11

D.E.E.R
RECEIVED
ACTION BY: IRK
NO: P90.
ACK: 2/4/14

Ash Cottage
Colwinston
Cowbridge
CF71 7NL

29th March 2014

RECEIVED

02 APR 2014

ENVIRONMENTAL
AND ECONOMIC
REGENERATION

Dear Sirs

Re Planning Application 2014/00242/FUL

Land to the rear of St David's primary school, Colwinston

I set out below two main objections to this planning application. I am aware of other grounds of objection raised on behalf of residents of the village by the Colwinston Community Council. I endorse and support those objections.

The inclusion of the site in the Deposit LDP has generated a considerable amount of adverse comment and objection in the public consultation. In view of this one hopes that the Council will consider this application premature - the timing also smacks of opportunism on the part of the applicant - and allows the LDP process to run its course before making any irreversible planning decisions of the scale contemplated in this application.

The proposed design, layout, and scale of the proposed development is totally unsuited to a small village.

There are only a total of approximately 130 houses in the village at present. In terms of scale an additional 62 houses must on any reasonable analysis amount to an overdevelopment of the village.

The density of housing in the proposed development is also far too high when juxtaposed with the number of houses and the layout of the existing settlement of Colwinston. This is graphically illustrated by the applicant's Location Plan. For example, the existing properties in Beech Park, adjacent to the proposed development site, occupy an area which is approximately one half of the proposed development site; a total of only 12 houses have been built there compared with 62 houses in the proposed development.

The modern design of the proposed development is more suited to an urban location and has no place in a rural setting. The incongruity between the proposed and existing housing is compounded by the developer's intention to build along a contiguous section of the northern boundary of the Conservation Area and in close proximity to historic and listed buildings in other parts of the village. Part of the proposed development also encroaches on good quality agricultural land.

Local Authorities, have a statutory duty to preserve and enhance Conservation Areas when considering planning applications. Although the proposed development falls outside the Conservation Area, its close proximity to the Conservation Area cannot fail to have an impact on it. For the reasons outlined above it is impossible to see how the construction of a 62 property housing estate could either preserve or enhance Colwinston's Conservation Area status.

The proposed development will fail to meet the requirement of Policy MD 3 (9) as it will have an unacceptable impact on highway safety.

The building of 62 houses is likely to increase the volume of traffic in the village by between a third and a half as the vast majority of "new" residents will inevitably regard the use of private transport as essential. Most of the additional traffic will use the shortest of the two routes through the village to the A48. As one travels out of the village on this route past Maes-y-bryn the road narrows into a country lane. Here, it is difficult for two vehicles of average size to pass without one giving way to the other. Along this stretch of lane there are nine houses, some of which are located on blind corners and others (like my own) where driveways emerge directly into the lane. These properties have little or no lines of sight to check for on - coming traffic. Despite exercising extreme caution when driving into the lane I can personally vouch for a number of near collisions in the past. At the time of writing a 12 metre skid mark can be clearly seen on the lane opposite Windlesham House. Regrettably, a significant minority of drivers regularly exceed the 30 mph speed limit.

The current position is dangerous but the risk of an accident will increase significantly with a higher volume of traffic. Surprisingly, the Traffic Statement submitted with the developer's planning application takes no account of these obvious issues of road safety. It follows that no suggestions have been made by or on behalf of the developer as to how the issues highlighted should be addressed or alleviated. I sincerely hope that the Council's Highway Department will make a full and proper assessment of these specific concerns before the application for planning permission is determined.

Yours faithfully



Robert Ryder

Appendix A.

Comment for planning application 2014/00812/FUL

Application Number	2014/00812/FUL
Location	The Grange, St. Brides Super Ely
Proposal	Erection of a single wind turbine, with a maximum blade tip height of 77m, along with accompanying access track, crane hardstanding, substation and temporary construction compound.
Case Officer	Mr. Steven Rennie
Name	Mr Roger Lewis
Address	Sant Y Nyll Cottage, Heol Sant Y Nyll, St Brides Super Ely, Cardiff, CF5 6EZ, CF5 6EZ
Type of Comment	Objection
Comments	<p>I live a short distance from the turbine and strongly object to its siting in an area of outstanding natural beauty. The turbine would have a detrimental effect on the view & general tranquility of the area. Nearby property values would be dramatically affected by the background noise in a quiet natural habitat. There has been no prior consultation & I would expect to have been asked to comment prior to planning. The Peterston Super Ely area is regarded as one of the best and most expensive places to live in Wales due to its rural and unspoilt atmosphere. This application would severely damage the areas image. The councils commitment to ensure long term protection of the remaining rural areas bordering Cardiff. Cardiff has recently passed 2 massive housing proposals ,North of Heol Sant y Nyll & West at St Fagans. If this proposal is passed it will only encourage further development in the area</p>
Received Date	28/7/2014 09:51:15
Attachments	28/7/2014 09:51:15

Appendix A

Comment for planning application 2014/00812/FUL

Application Number 2014/00812/FUL**Location** The Grange, St. Brides Super Ely**Proposal** Erection of a single wind turbine, with a maximum blade tip height of 77m, along with accompanying access track, crane hardstanding, substation and temporary construction compound.**Case Officer** Mr. Steven Rennie**Name** Mr Graham Swainson**Address** Brides Lacey, St Brides-super-Ely,, CF5 6EY**Type of Comment** Objection

Comments

1 At 77m this turbine will be too obvious and out of place in the landscape as there is no other high structure in the area 2 It is out of character with the sensitive nature of the landscape which we understood the Council has committed to retain. 3 Consent will lead to a proliferation of turbines in Vale villages as has happened in parts of Cornwall where the landscape has been ruined by a ribbon development of turbines such as on one road leading to Padstow. 4 Most land turbines are inefficient, particularly in low lying areas, as in the proposed location, and would not be built without subsidy. They are better offshore. Typically out of every 10 land based turbines observed 3 or 4 will not be working! 5. The low lying Vale would be better suited to solar panel "farms" which could be hedge screened naturally. 77m turbines cannot be naturally screened and are therefore a permanent blot on the landscape.

Received Date 30/7/2014 04:19:04**Attachments** 30/7/2014 04:19:04

2014/01186/FUL

Yr Arolygydd Cynllunio, Afdelad y Goron, Parc Cathays,
Caerdydd CF10 3NQ ☎ 029 2082 3889 Ffacs 029 2082 5150
e-bost wales@planning-inspectorate.gsi.gov.uk



APPENDIX A

The Planning Inspectorate, Crown Buildings, Cathays Park,
Cardiff CF10 3NQ ☎ 029 2082 3889 Fax 029 2082 5150
e-mail wales@planning-inspectorate.gsi.gov.uk

Penderfyniad ar yr Apêl

Ymweliad safle a wnaed ar 10/9/07

Appeal Decision

Site visit made on 10/9/07

gan/by Hywel Wyn Jones BA (Hons) BTP MRTPI

Arolygydd a benodwyd gan y Gweinidog an Inspector appointed by the Minister for
dros yr Amgylchedd, Gynaliadwyedd a Environment, Sustainability and
Thai, un o Weinidogion Cymru Housing, one of the Welsh Ministers

Dyddiad/Date 03/10/07

Appeal Ref: APP/Z6950/A/07/2047366

Site address: Pencyrn Barns, Ystradowen, Cowbridge

The Minister for Environment, Sustainability and Housing has transferred the authority to decide this appeal to me as the appointed Inspector.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mark Aston against the decision of the Vale of Glamorgan Council.
- The application (ref: 2006/01347/FUL), dated 26 September 2006, was refused by notice dated 14 December 2006.
- The development proposed is the conversion of 2 barns into dwelling and the alteration of the access to the highway as shown on the accompanying drawings.

Decision

1. For the reasons set out below I dismiss the appeal.

Main Issue

2. I consider that the main issue in this case is whether the buildings are suitable for the proposed residential use, particularly in terms of any effect on the character and appearance of the area and the generation of car-borne journeys, having regard to local and national planning policy.

Reasons

3. The site lies within an area of open countryside, within a landscape acknowledged for its attractive quality by its designation as a Special Landscape Area in the adopted Vale of Glamorgan Unitary Development Plan 1996-2011 (UDP). Policy ENV 8 of the Plan deals with Small Scale Rural Conversions and is supported by supplementary planning guidance: The Conversion of Rural Buildings. I have also taken into account national planning policy, in particular paragraphs 7.6.10-11 of Planning Policy Wales, March 2002.
4. In addition to the 2 traditional farm outbuildings envisaged for conversion the site contains a corrugated-sheet clad shed and the framework remains of a former barn. Immediately behind the site lie the farmhouse and a collection of modest outbuildings. A high, dense roadside hedgerow forms an effective screen to this group of buildings from the road save at the point of access.

5. The largest of the barns is a single-storey structure which has been insensitively repaired over the years. The structural report accompanying the application explains that parts of the walls would need to be rebuilt and the roof replaced. The scheme envisages excavation works to lower ground levels around the buildings, most significantly in the case of the larger barn where the works are intended to create sufficient space to facilitate the provision of a second storey. The resultant building would appear materially different to the present structure particularly as the intended lowering of the windows and doors would increase the gap between the eaves and the heads of these openings. This would harm its agrarian character, contrary to criterion (iv) of Policy ENV 8.
6. The proposed removal of a significant section of the indigenous roadside hedge and re-positioning of the access would open up views of the site to the detriment of the intimate, pleasant character of this country lane. A bridleway crosses the site and a public right of way, which runs along higher ground to the north and west, overlooks it. The scheme would create a large area of residential curtilage around the two buildings; both national and local planning policies recognise the harmful impact that such domestication can have on rural areas. The manifestations of residential use of the site, such as external lighting, parked vehicles, garden furniture and play equipment, would erode the landscape quality of the area contrary to the aim of Policies ENV 4 and ENV 8(v).
7. The harm to the area's character and appearance that I have identified outweighs any potential benefits that would arise from the scheme, including the removal of the dilapidated structures, the refurbishment of the buildings and the scope for landscape planting.
8. The supporting text of Policy ENV 8 recognises the sustainability issues that arise from the conversion of isolated buildings for residential purposes. Strategic Policies 2 and 8 emphasise the importance of achieving sustainable patterns of development, which is a cornerstone of government policy. The appellant accepts that the lack of local services including public transport is such that future occupiers would be likely to be dependent on a private car for most services and sources of employment. The appellant points out that there are villages nearby that may not fare materially better in this respect but which are envisaged to accommodate some new residential development in the UDP – this consideration does not justify permitting further development in such remote locations.
9. I conclude on the main issue that the proposed development would harm the character and appearance of the area and would lead to future occupiers being dependent on a private car to access most day-to-day services. The scheme is contrary to the aims of local and national planning policies.
10. I have taken into account all other matters raised in support of the application, including the benefit of the scheme in reducing the isolation of the neighbouring farmhouse, the sustainable measures that would be incorporated in the conversion works and the representations of Ms Jane Hutt, the local Assembly Member. None leads me away from my findings on the unacceptability of the scheme.

Hywel Wyn Jones

INSPECTOR



Penderfyniad ar yr Apêl

Gwrandawriad a gynhaliwyd ar 19/08/08

Ymweliad â safle a wnaed ar 19/08/08

Appeal Decision

Hearing held on 19/08/08

Site visit made on 19/08/08

gan/by Clive Nield BSc, CEng, MICE, MCIWEM

**Arolygydd a benodwyd gan y Gweinidog
dros yr Amgylchedd, Gynaliadwyedd a
Thai, un o Weinidogion Cymru**

**an Inspector appointed by the Minister for
Environment, Sustainability and Housing,
one of the Welsh Ministers**

Dyddiad/Date 02/09/08

Appeal Ref: APP/Z6950/A/08/2072658

**Site address: Land and buildings at Crofta Farm, Ystradowen, Vale of
Glamorgan**

**The Minister for Environment, Sustainability and Housing has transferred the
authority to decide this appeal to me as the appointed Inspector.**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr Mark Canning against the decision of the Vale of Glamorgan Council.
- The application Ref 2008/00094/FUL, dated 30 December 2007, was refused by notice dated 14 March 2008.
- The development proposed is change of use of an agricultural building to 1 No. dwelling (Barn 2 only).

Decision

1. I dismiss the appeal.

Background and Procedural Matters

2. A previous application was made for the conversion of 3 traditional stone barns to dwellings, which was subsequently amended to 2 barns. However, in view of the Council's concerns about the condition of 2 of the barns, that application was withdrawn in November 2007 (ref. 2007/00078/FUL). The current appeal application refers to only one of the barns and to a smaller site area.
3. It has been suggested that the other 2 barns might be used as storage buildings for the proposed dwelling. However, they lie outside the appeal site and any such use is not included within the appeal application. Their future remains unresolved. There are also several large modern buildings in the farmyard complex and, although not all are within the appeal site, the application plans indicate that 3 would be demolished. The 3 buildings are within land under the control of the applicant, and their demolition is taken to be part of the proposed scheme.

Main issues

4. The main issues in this case are whether or not the nature and location of the development represents a sustainable form of development and the effects on the rural character of the area.

Reasons

5. The site is in the open countryside well outside any settlement boundaries. It is not part of a hamlet or even part of any loose grouping of properties. Crofta Farm, comprising a former farmhouse and a yard of 3 old barns and a number of more modern agricultural buildings, is quite separate from any other built development, even the dwelling opposite the entrance to the access track. The lane from the village of Ystradowen is very narrow and has poor forward visibility due to bends and undulating levels. Although there is reported to be a bus route along the main road through the village, it would be difficult and dangerous to walk along the lane to use that means of transport, and there can be little doubt that future occupants of the proposed dwelling would be almost completely reliant on the private car.
6. Although the proposal would provide a use for a building that is unsuited to modern agricultural use and is under-utilised nowadays, that benefit would be substantially outweighed by the other factors of lack of sustainability, particularly its remote location, poor means of access and reliance on the private car. The proposed additional dwelling in this location would be an unsustainable form of development contrary to the aims of national and development plan policies.
7. Several examples of planning permission being granted for similar rural building conversions (both by the Council and on appeal) have been put forward to support the Appellant's case, and it is argued that these represent similar circumstances so far as sustainable locations are concerned. However, the Council has cited other appeal decisions where lack of sustainability has been an important factor influencing refusal. These illustrate the importance of considering the particular circumstances of each proposal, and that is what I have done in this case. My conclusion is that the current proposal would conflict with important policy aims for sustainable development.
8. National and development plan policies also presume against development in the open countryside, except in certain circumstances. The small scale conversion of rural buildings is one of those exceptions, though preference is for the new use to benefit the diversification of the rural economy, and the proposed residential use would not provide that benefit. Nevertheless, Unitary Development Plan Policy ENV 8 applies to all types of conversion and sets out a range of criteria for such development. These include requirements that effects on character and appearance are acceptable, including impacts of the curtilage, access and changes to the building.
9. In this case, changes to the building itself would be quite limited but the area around the building would take on the appearance of residential curtilage and necessary improvements to the access would also increase its visual impact. Although additional development within the curtilage could be restricted by applying conditions to limit permitted development rights, it is inevitable that residential use of the land would result in its character and appearance changing

due to the paraphernalia and clutter associated with domestic use. Two public footpaths pass close to the southern boundary of the site, and the proposed dwelling and curtilage would be clearly visible from those footpaths.

10. At present the farm yard and surrounding area is indisputably rural in character. However, the proposed development would introduce additional residential activity and appearance to the detriment of that character. This would conflict with several criteria of UDP Policy ENV 8 and with the aims of wider national and development plan policies to safeguard the character and appearance of the open countryside.
11. There is little dispute that the barn is capable of conversion without substantial reconstruction or that the proposal would contribute towards Government aims for the provision of a wider choice of housing. I have taken into account these and all other matters raised, including conditions that might be possible, but they do not outweigh the considerations that have led me to my main conclusions that the proposal would represent an unsustainable form of development in the open countryside and would be unacceptably detrimental to the rural character and appearance of the area. For these reasons I conclude that the appeal should be dismissed.

Clive Nield

Inspector

APPEARANCES

FOR THE APPELLANT:

Mr Chris Morgan, BA, DMS, Agent.
MBA, MCFI, MRTPI

FOR THE LOCAL PLANNING AUTHORITY:

Ms Justina Walsh, BSc, DipTP, Principal Planning Officer (Enforcement and
MRTPI Appeals), Vale of Glamorgan Council.

DOCUMENTS

- 1 Letter of Notification and list of persons notified.
- 2.1-2.4 Refusals of Planning Permission and corresponding Appeal
 Decisions for 2 barn conversion development proposals,
 provided by Council.

PLANS

- A1-A5 Application plans: location and site plans (with red line
 boundaries); site plan with details of other building
 demolitions and access driveway; Existing (drg.4) and
 Proposed (drg.5) plans of barn.
- B Plan of public footpaths, provided by Council.

DEER
RECEIVED
ACTION BY: JMC YP
NO: P248
ACK: 14/11/14

RECEIVED

14 NOV 2014

ENVIRONMENTAL
AND ECONOMIC
REGENERATION

14/01193/FUL/YP 3

The Meynell,
Trerhyngyll,
Cowbridge,
Vale of Glamorgan.
CF71 7TN

Mrs. Y.J. Pritchard
Development & Building Control (Planning),
The Vale of Glamorgan Council,
Dock Office,
Barry Docks,
Barry.
CF63 4RT

12th November 2014

Dear Mrs. Pritchard,

Ref: Application No. 2014/01193/FUL/YP - Land adjacent to The Meynell, Trerhyngyll.

Proposed erection of a new dwelling on an agricultural, green field site, outside the village settlement boundary.

I write in connection with the above planning application. We have examined the plans and overlook the above site. We wish to object strongly to the development of the new building in this location.

- Trerhyngyll is a settlement where development proposals should be considered very carefully: rounding off would ruin the character of the village. The villages existing boundaries would be broken on the north and west.
- **Issues which affect the community as a whole:-**
- Inadequacy of the lanes (generally single track) to accommodate even small increases in traffic (this property proposes an increase of a minimum of at least 3 vehicles + visitors).
- Trerhyngyll already has enough large houses (some currently on the market) so there is no identified need for any building of additional housing.
- The single track lanes adjacent to the proposed site regularly flood due to water draining from the hillside and become impassable making residents of the village take an alternative route. This development would increase further runoff and exacerbate an existing flooding problem.
- During the winter months the runoff regularly turns to ice (the lanes do not benefit from road gritting – in previous winters cars have slid down the steep lane into hedges).
- The responsibility of the council under the HRA protocol 1, article 1. This states that a person has the right to peaceful enjoyment of all their possessions,, which include the home and other land additionally, article 8 of HRA states that the person has the substantive right to respect for their private and family life, in the case of 'Britton V SOS' the courts re-appraised

CONT'D

14/01/93/FUL A¹₄

the purpose of the law and concluded that the protection of the countryside falls within the interests of article 8. Private and family life therefore encompasses not only the home but also the surroundings.

- Currently there is no building on the land and therefore provides an area for wildlife which includes Bats, Birds to include birds of prey who regularly feed on this land, Foxes, Badgers etc – this would be lost if planning is permitted.
- A Hedgerow which currently provides habitat for wildlife would also be destroyed if building is permitted. (The Environment Act 1995, The Hedgerows Regulations 1997 Schedule 4). The current hedgerow is more than 150 years old and adjacent to land used for Agriculture.
- Light pollution from a new build on this agricultural land would have a detrimental effect on birdlife and bats (who are seen to be feeding in this area regularly).
- The proposed site is in constant use as Agricultural land with this year alone having 3 cuts of haylage which is used by a local farmer for his cattle.

Yours sincerely,



D.K. Britton (Mr.)



J.A. Townsley (Mrs.)

14/01193/FUL A,

12 November 2014

M Goldsworthy
Operational Manager Development and Building Control
The Vale of Glamorgan Council
Dock Office
Barry Docks
Barry
CF63 4RT

Mr H Jackson
Whitebeam Cottage
Trerhyngyll
Cowbridge
Vale of Glamorgan
CF71 7TN

Your Ref: P/DC/YP/2014/01193/FUL

Dear Sirs,

I write with regard to the above planning application to register my strong objections to the proposed development.

I have carefully reviewed the plans and would object on three main grounds with details of each as follows;

General/Community Objections

1. The proposed development is on land designated as agricultural. The land is in regular use for silage to provide food crops for overwinter feeding.
2. A change of use to allow development would set a precedent for the rest of the field as the ground remaining would be of lesser use for cropping.
3. The proposed development would be an extension of the current village boundary and thus set a further precedent for additional development
4. The proposed dwelling would be out of character for the village and would seriously diminish the visual aspect of entry to the village
5. It is doubtful to see the need for further dwellings of this size in the village as several other, similar size dwellings have been for sale for several years. Therefore no market demand.

Environmental Objections

1. Access to the proposed development would be from a single track lane and would add to the amount of traffic using the, already overused lane.
2. The lane is subject to flooding and due to the elevated aspect of the proposed development this would undoubtedly increase the amount of surface water on the lane
3. There would be the loss of established hedgerow to allow access to the proposed development
4. There would be an inevitable effect on wildlife that is regularly seen in the field
5. It is difficult to see how the proposed development could be linked to mains drainage.

Personal Objections

1. My house frontage is very close to the lane and directly opposite the proposed development. The size of the proposed development would dwarf my dwelling due to its elevated aspect and result in a loss of privacy.
2. Due to the narrow lane there would be a difficult entry and exit from the property that would mean larger vehicles probably having to cross onto my property to achieve a 'swing' to gain access exit. The below photo taken from my kitchen window shows how close the proposed entry/exit is and the narrowness of the lane.

D.E.E.R
RECEIVED
ACTION BY: JHC YP
NO: PA.129
ACK: 11

RECEIVED

14 NOV 2014

ENVIRONMENTAL AND ECONOMIC RECEIVED

14/01193/PLC 'A' 2



Please accept this representation as a register of objection and hope for a rejection of the proposed development.

Yours sincerely

Mr Harry Jackson

Copy enclosed for Mrs Y. J. Pritchard

1 Old Chapel
The Limes
Cowbridge
Vale of Glamorgan
CF71 7BJ

APPENDIX A

P/DC/YP/2014/01237/FUL

M Goldsworthy
Operational Manager Development and Building Control
Vale of Glamorgan Council
Dock Office
Barry Docks
Barry CF63 4RT

6th December 2014

RECEIVED
RECEIVED
ACTION BY: JMC YP
NO: 9
DATE:

RECEIVED

10 DEC 2014

ENVIRONMENTAL
AND ECONOMIC
REGENERATION

Dear Sir

Town and Country Planning Act, 1990 (as amended)
Application No. 2014/01237/FUL/YP
Location: Vacant land, The Limes, Cowbridge
Proposal : Erection of two blocks of apartment each containing six dwelling units

I write with regard to the above application and have seen the plans for this proposed development and make the following comments:

There have been several planning applications made for this site over the last fourteen years or so and this latest proposal for 2 blocks of 3 storey flats is not unlike a previous application which was turned down. It also appears that a recent application for 10 cottages lapsed as no progress was made by the developer.

My property (1 Old Chapel) is immediately opposite this proposed application and greatly affects me and neighbouring properties. The height of the proposed two blocks of three storey high flats would completely overshadow our properties and be out of character with the surrounding area. I note a footpath has been included in the plans but the road is still very narrow, single track and pavementless.

It is also a great worry to me that the entrance to the proposed development is directly opposite my property (1 Old Chapel) and the amount of coming and going of cars (18 places allocated) plus the large amount of traffic at peak times. This includes school

traffic plus children and parents walking to and from school and the public generally. Also traffic use The Limes to avoid the traffic lights on the main road and all this makes it very busy particularly at this single track section of the road. This is a very dangerous situation regarding safety.

This is an important part of the Cowbridge conservation area and these proposed plans do not fit in with the surrounding small cottages and terraced houses. The scheme does not preserve or enhance the quality of the area.

To me this is a very poor scheme particularly in this lovely part of Cowbridge

Conservation area and should be rejected.

Yours sincerely

A black rectangular redaction mark covering the signature of Josephine M Weston.

Josephine M Weston (Mrs)

ONS C

**Limes Court Mews
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Tel No 01446 772438
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Mr Robert Thomas
Director of Development Services
Vale of Glamorgan Council
Vale of Glamorgan Offices
Dock Offices
Barry Docks
Barry
CF63 4 RT

Your Ref: 2014/01237/FUL/YP
FAO Ms Yvonne Pritchard

9th December 2014

Dear Sir,

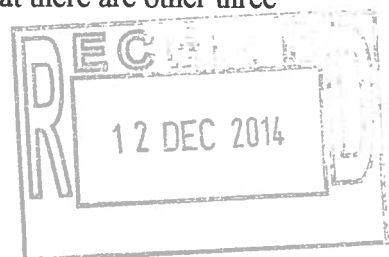
Planning Application for 2 blocks of apartments, the Limes, Cowbridge

I am writing in respect of the above which appears to be a re-hash of an application submitted and refused by your Department many years ago. Over the intervening years other applications have been made by this Developer and I recall that the last of these submitted in 2006 for a construction of 10 cottages was likely to be approved although nothing was progressed.

This site is derelict, unsightly and most probably unhealthy with vermin sighted at differing times over the years which have required professional attention from the Environment Heath Department.

I have no objection to housing being created on this site but I do object to the plan currently under consideration. The creation of 10 dwellings is, at least, 2 too many and I feel that a more realistic number would be 8. This is not a particularly large site and to achieve the number proposed would entail high buildings which would overlook/overshadow neighbouring homes. Whilst I appreciate that there are other three

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properties. Additionally, these are not very attractive buildings which would detract from the neighbouring 'character' cottages and houses.

Furthermore the increase of traffic in this already extremely narrow lane would be most hazardous for pedestrians and other road users alike. This area is in constant use each and every day by a wide range of individuals and vehicles and it seems from the plans that a pavement will be created but this will be for only part of the lane.

The Limes is within the Cowbridge Conservation Area and is specifically referred to in the Cowbridge and Llanblethian Appraisal and Management Plan 2010 as 'an intimate space formed by the juxtaposition of a number of small cottages and terraced houses'. However during the past 10 years, we have expressed concerns at other residential developments that have been proposed/taken place within The Limes which did not appear to be within this description. In the majority of cases these applications were passed without major change resulting in some negative changes to the character and appearance of this small area. Any further erosion of the character of The Limes would be most unacceptable and in direct contradiction to the Vale Council's own Conservation Area Policy.

With other proposals under consideration for large housing developments either side of Cowbridge, if we continue to allow inappropriate style dwellings within the town's boundaries and most particularly its Conservation areas, the historic aspects that draw so many to the town will eventually disappear which would be a huge loss not only to local residents but to the Vale as a whole.

Yours faithfully,

A large black rectangular redaction box covering the signature of the sender.

K. A Evans