

Meeting of:	Cabinet
Date of Meeting:	Monday, 18 March 2019
Relevant Scrutiny Committee:	Environment and Regeneration
Report Title:	Adoption of Supplementary Planning Guidance on Tourism and Leisure Development, Renewable Energy and Parking Standards
Purpose of Report:	To advise Cabinet of the results of the public consultation on the draft Supplementary Planning Guidance (SPG) in relation to Tourism and Leisure Development, Renewable Energy and Parking Standards and to seek approval to adopt them for development management purposes.
Report Owner:	Cabinet Member for Regeneration and Planning
Responsible Officer:	Rob Thomas, Managing Director
Elected Member and Officer Consultation:	Cabinet Member for Regeneration and Planning, Head of Regeneration and Planning, Operational Manager Engineering, Group Manager Transport Services, Operational Manager Neighbourhood Services: Operations, Operational Manager for Regeneration, Team Leader Economic Development Creative Rural Communities, Energy Manager, Lawyer - Legal Division, Operational Manager Accountancy.
Policy Framework:	This is a matter for Executive decision by Cabinet.

Executive Summary:

- This report outlines the consultation responses received on the Council's three draft SPGs on Tourism and Leisure Development, Renewable Energy and Parking Standards. The Parking Standards SPG will replace the existing one published in 2015 and the other two SPGs are new.
- The report also seeks Cabinet's endorsement of the proposed changes to the draft SPGs as a result of the comments received (Appendix 1 refers) and the approval of the three amended SPGs (Appendices 2 to 4 refer) for immediate use in development management decisions. A total of 15 organisations/individuals commented on the three draft SPGs during the 6 week public consultation period which took place between 4th January and 15th February 2019. The main points raised in respect of each draft SPG is set out in section 4 of the Cabinet report below.

Recommendations

1. That Cabinet notes the contents of the report and endorses the responses to the representations received on the draft SPGs attached at Appendix 1.
2. That subject to the provisions of recommendation 1.3, Cabinet approves the amended SPGs attached to this report as Appendices 2 - 4 for use in development management decisions alongside the adopted Vale of Glamorgan Local Development Plan (LDP) and that the Parking Standards SPG replaces the previous version adopted in 2015.
3. That the Head of Regeneration and Planning be authorised to agree the final format of and any necessary typographical changes and minor amendments to the SPGs prior to their publication, and thereafter update them with any factual updates in response to policy or legislative changes as appropriate.
4. That Cabinet approves consequential changes to the Council's other SPGs e.g. Planning Obligations, resulting from the adoption of the SPG which are the subject of this report.
5. That Planning Committee is advised of the outcome of the public consultation and the adoption of the SPGs for development management purposes.

Reasons for Recommendations

1. To provide a summary of the public consultation undertaken on the Tourism and Leisure Development, Renewable Energy and Parking Standards SPGs and to seek Cabinet's endorsement of the responses and changes to the finalised SPGs.
2. To ensure the effective consideration of planning applications following the adoption of the LDP and to provide decision makers, applicants and developers access to the Council's most up to date guidance relating to Tourism and Leisure Development, Renewable Energy and Parking Standards.
3. To accommodate any necessary changes and / or amendments resulting from revised national policy and guidance and to enable the correction of any typographical or minor errors found within the new SPGs.
4. To ensure conformity between the Council's adopted SPG documents.
5. To inform Planning Committee of the adoption of the new SPGs as material considerations in the determination of future planning applications.

1. Background

- 1.1 Cabinet will recall a previous report of the 3rd December 2018, which outlined the need to update and / or prepare new SPGs in accordance with the monitoring framework contained within the Vale of Glamorgan LDP. The report sought approval to undertake a 6 week public consultation on a third batch of updated / new SPGs in respect of the following topics:
 - Tourism and Leisure Development;
 - Renewable Energy and

- Parking Standards

- 1.2 In accordance with Council minute C502, the six week public consultation exercise on the three draft SPGs took place between Friday 4th January 2019 and Friday 15th February 2019 with the relevant documentation being made available at the main Council offices and on the Council's web site.
- 1.3 Officers have considered the representations received in response to the consultation and have amended the SPGs where it was considered necessary or relevant. This report therefore summarises the results of the public consultation exercise and seeks the adoption of the finalised SPGs to ensure advice for these policy areas remains up to date and can be considered alongside the LDP when determining planning applications.

2. Key Issues for Consideration

- 2.1 In total, 15 organisations / individuals commented on the three draft SPGs, including 1 late representation (which has not been considered). The comments received, the Council's responses and the proposed changes to the SPGs are set out in the table at Appendix 1 to this report. It should be noted that when the draft SPGs were prepared and approved for consultation purposes, the Welsh Government had not published the final version of Planning Policy Wales Edition 10 (PPW). The SPG's have therefore now been reviewed and updated and the references to PPW Edition 9 amended accordingly. These changes are shown in the amended SPGs attached in appendices 2-4.
- 2.2 A brief summary of the main points raised during the consultation are set out below for each of the SPGs:

- Draft Tourism and Leisure Development SPG

- 2.3 Natural Resources Wales (NRW) wanted the SPG to highlight that highly vulnerable tourism and leisure development such as campsites, holiday lets etc. should not be permitted in Zone C2 of the Development Advice Map contained in Technical Advice Note 15. NRW also recommended that additional comments were included in the SPG in respect of drainage. Appropriate amendments have been included in the SPG.
- 2.4 Glamorgan Gwent Archaeological Trust (GGAT) pointed out that the Glamorgan Heritage Coast was designated not only for its special environmental qualities but also for archaeological and historic environment reasons. GGAT also highlighted the importance of non-designated historic assets and stated that new tourism and leisure development can have both positive and negative impacts on the historic environment. GGAT further commented that the conversion of historic buildings or structures to new tourism or leisure uses may require mitigation by historic building recording or archaeological fieldwork. Appropriate amendments have been included in the SPG.

- 2.5** Barry Town Council expressed overall support for the SPG but considered that there should be more references to the tourism and leisure opportunities provided by towns such as Barry and Penarth. Appropriate amendments have been included in the SPG.
- 2.6** South Wales Police remarked that it is important that any new buildings are designed to be safe and secure, particularly in rural locations which are often isolated or not well over looked. They also recommended that consideration is given to developing activities which would increase the legitimate use of areas for tourism and leisure purposes in order to increase levels of surveillance and capable guardianship. Appropriate amendments have been included in the SPG.
- 2.7** The Friends of the Earth made a number of comments in respect of the SPG relating to the coastal path and its use by cyclists and current Welsh Government Policy in respect of the coast. No changes are proposed to the SPG as a result of these comments.

- Draft Renewable Energy SPG

- 2.8** GGAT noted that new renewable energy development may have both visual and physical impacts on both designated and non-designated historic assets and archaeological resources. They also raised the importance of appropriate mitigation where required. Appropriate amendments have been included in the SPG.
- 2.9** South Wales Police referred to the importance of security of energy supplies especially in areas which are isolated or prone to crime. Appropriate amendments have been included in the SPG.
- 2.10** Llandough Community Council raised concerns regarding wall mounted and free standing wind turbines in residential areas and the use of distribution cables within large solar farms. They also showed general support for the SPG. No changes are proposed to the SPG as a result of these comments.
- 2.11** NRW made a series of comments seeking to emphasise the importance of ecological considerations when assessing renewable energy proposals. Particularly in reference to wind turbines and their potential to disrupt bats and birds. They also identified two factual errors in relation to Habitats Regulation Assessments. Appropriate amendments have been included in the SPG.
- 2.12** Cadw made comments on the need to signpost existing national guidance relating to historic assets. Furthermore, they suggested a number of amendments which reinforced the importance of historic assets when assessing development proposals for renewable energy generation schemes. Appropriate amendments have been included in the SPG.

- 2.13** Barry Town Council made reference to the fact that the SPG only covers three types of renewable energy and that the maps contained within the Appendices needed to have site lists. Additionally they commented on the recent BBC press release relating to wood burners and their impact on air quality and the need for large scale biomass developments to require an Environmental Impact Assessment. There were also concerns raised to the impact on Barry in relation to potential heat and energy opportunities and a lack of reference to offshore renewable energy schemes. No amendments are suggested.
- 2.14** South Wales Police commented on the need to include a section on security of renewable energy schemes and requested that the contact details of the Designing out Crime Officer are included. Appropriate amendments have been included in the SPG.
- 2.15** Savills made comments on the need to include an ambitious renewable energy generation target within the SPG which would be achieved by emphasising a presumption in favour of development on the identified sites in the appendix as well as a pragmatic approach to development outside these areas. Furthermore, sites should be included in the SPG where there is known potential for them to be developed for renewable energy purposes. Appropriate amendments have been included in the SPG.
- 2.16** Friends of the Earth objected to the SPG on the grounds that it should contain more positive wording on wind turbines in the Coastal Zone and have positive policies for connecting the Severn Estuary tidal and wave devices to the electricity grid. No amendments have been recommended for consideration.

- Draft Parking Standards SPG

- 2.17** Barry Town Council raised a number of issues in respect of specific planning applications which cannot be addressed within the SPG, questioned whether it was prudent to include guidance on electric vehicles given that the technology was still evolving and suggested that the SPG could benefit from photographs and specific parking requirement examples. Appropriate amendments have been included in the SPG.
- 2.18** GGAT considered that parking may have an impact on both designated and non-designated historic assets as well as archaeological resources and recommended that this point is noted in the adopted SPG as a consideration. No changes are proposed as a result of the comments made by the GGAT as they are considered to be adequately covered within other guidance.
- 2.19** South Wales Police commented that new car parking and cycle stands should be positioned in areas that are well over looked with adequate street lighting provision to enhance personal safety and to prevent crime. An appropriate amendment has been included in the SPG.

- 2.20** The House Builders Federation, Redrow Homes, Savills and RPS expressed concerns regarding the introduction of standards of provision for electric vehicles associated with new development as set out in the draft SPG. They argued that the introduction of the requirements in paragraphs 7.2.1 and 7.2.2 of the draft SPG is not compliant with the recently published PPW 10 and LDP Manual Edition 2 (2015) as the LDP does not include a specific policy on Electric Vehicle Charging Points (EVCPs). The HBF also pointed out that the standards for EVCPs in residential development as set out in the draft SPG are not in line with the European Building Directive 2018 which relates to residential buildings with more than 10 parking spaces and not individual properties. The requirement for the provision of passive EVCPs as set out in the draft SPG is not supported by Redrow Homes and there are concerns regarding the ability of the utility providers to supply the required power levels for this type of infrastructure. Furthermore, Redrow Homes have queried how the ongoing running costs of providing public EVCPs will be funded.
- 2.21** The original draft SPG was based on the contents of the guidance contained within the draft version of PPW 10 which was far more positive in its approach to the provision of electric vehicle infrastructure than the final version of PPW 10 published at the end of 2018. A number of amendments have been made in the SPG to reflect the concerns expressed above and to bring the SPG more in line with the final published PPW 10.
- 2.22** Councillor Johnson raised a number of points including, time limiting the effectiveness of previous uses as they impact upon parking surveys, issues surrounding the level of parking that should be provided within parking courts, and the appropriateness of the defined parking zone as it applies to Barry Island and the overall use of 'maximum' parking standards. Appropriate amendments have been included in the SPG.
- 2.23** The WRAP Around Residents' Action Group objected to the draft Parking Standards SPG but raised a number of issues regarding the current planning system in light of a planning application at the United Reformed Church (Application no.2016/00219/FUL refers) which has subsequently been approved at appeal (Appeal no.17/3169539 refers). This consultation specifically relates to 3 draft SPGs and it is not possible for this type of document to change national planning policy, planning legislation, go beyond the scope LDP or comment on planning application and appeal decisions. Therefore, those comments are not considered to be appropriate within the context of this consultation exercise. However, valid comments were made regarding the contents of the draft Parking Standards SPG which objected to the use of maximum parking standards; the wording of the document in relation to how the standards should be applied and how the SPG reflected national and local planning policy objectives. Due to the size of the submitted representation only comments relating directly to the draft Parking Standards SPG have been included within Appendix 1. For the purposes of clarity the full representation has been included at Appendix 5. Appropriate amendments have been included in the SPG.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1 Long Term** - The LDP monitoring framework requires the Council to prepare and adopt new / updated SPGs in respect of various topics within a specified timeframe. SPGs support and add detail to specific LDP policies and provide applicants with clarity on how relevant proposals will be assessed. The LDP is evidence based, takes into account future trends and sets out the planning policy framework for the period 2011 to 2026.
- 3.2 Prevention** - The SPGs referred to in this report together with the corresponding policies in the LDP will help to minimise the negative impacts of new development on the built and natural environment and have a positive impact on economic, environmental, social and cultural well-being.
- 3.3 Integration** - All of the SPGs have been prepared in conjunction with relevant service areas and will assist in the delivery of several of the Council's Well Being Objectives. The Tourism and Leisure Development SPG will help to deliver objective 3 by protecting and enhancing the existing tourism offer in the Vale of Glamorgan and creating more local employment opportunities. The SPGs will also help to deliver objective 4 by encouraging low impact, sustainable tourism and leisure development in rural areas and objective 6 by ensuring that the Vale's built, natural and cultural heritage is protected and where possible enhanced. Tourism and leisure development also helps to encourage and promote active and healthy lifestyles referred to in objective 7.
- 3.4** The Renewable Energy SPG will help to deliver objective 4 by building on the existing LDP policies and identifying areas which have the potential for wind energy, solar energy and biomass developments.
- 3.5** The Parking Standards SPG will help to deliver objectives 3, 4 and 7 by adopting 'maximum' car parking standards for new developments in order to reduce congestion and encourage a shift towards more sustainable modes of transport. The SPG also includes information on the Council's requirements in relation to the provision of infrastructure on new development for Ultra Low Emission Vehicles.
- 3.6 Collaboration** - The preparation and adoption of all three SPGs aligns with objective 4 in the Vale Public Services Board's Well-being Plan - to protect, enhance and value our environment.
- 3.7 Involvement** - A 6 week public consultation on the draft SPGs has been undertaken by officers in accordance with the Council's corporate public consultation procedures. Copies of the draft SPGs were made available to view at the Council's main offices and on the website. In addition, officers directly contacted interested parties so that they were made aware of the consultation. The draft SPGs have been subsequently amended where appropriate in light of

the comments received. An Equality Impact Assessment (EIA) was carried out as part of the LDP process. As the draft SPGs relate directly to the policies in the adopted LDP, a further EIA is not considered to be necessary.

4. Resources and Legal Considerations

Financial

- 4.1** The preparation, consultation and adoption of the SPGs referred to in this report has been undertaken by officers within the Regeneration and Planning Division within existing budgets.

Employment

- 4.2** There are no employment implications arising from this report.

Legal (Including Equalities)

- 4.3** The adopted SPGs will be used as a material consideration in the determination of relevant planning applications and appeals. The Council has considered the requirements of the Well Being of Future Generations (Wales) Act 2015 and the 7 well-being goals in the preparation of the SPGs.

There are no human right implications arising from this report.

5. Background Papers

Appendix 1 - Summary of draft SPG Consultation representations and the Council's responses.

Appendix 2 - Final Tourism and Leisure Development SPG

Appendix 3 - Final Renewable Energy SPG

Appendix 4 - Final Parking Standards SPG

Planning Policy Wales, Edition 10, December 2018:

<https://beta.gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

LDP Manual, Edition 2 (2015):

<https://gov.wales/topics/planning/policy/policy-and-guidance-on-development-plans/ldpmanual/?lang=en>

Vale of Glamorgan adopted Local Development Plan 2011 - 2026: <https://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/LDP/LDP-Adoption/Adopted-LDP-Written-Statement-June-2017-final-interactive-web-version.pdf>

Report of the Cabinet Member for Regeneration and Planning - Vale of Glamorgan Local development Plan 2011-2026: Public Consultation on Draft Supplementary Planning Guidance (SPG) on Renewable Energy, Tourism and Leisure Development and Parking Standards: [https://www.valeofglamorgan.gov.uk/Documents/ Committee%20Reports/Cabinet/2018/18-12-03/VoG-LDP-2011-2026-Public-Consultation-on-Draft-SPG.pdf](https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2018/18-12-03/VoG-LDP-2011-2026-Public-Consultation-on-Draft-SPG.pdf)

Parking Standards SPG (2015): <https://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/Parking-Guidelines-SPG.pdf>

Appendix 1: Responses received on Supplementary Planning Guidance in respect of Tourism and Leisure Development SPG, Parking Standards SPG, Renewable Energy SPG Public Consultation Friday 4th January to Friday 15th February 2019.

Note: The proposed amendments refer to paragraph numbers in the draft document and will alter following the final typesetting of the documents. As well as the specific responses and amendments detailed below, references to Planning Policy Wales (PPW) have been updated to reflect the publication of PPW 10 in December 2018 and minor factual updates have been included.

Tourism and Leisure Development		
Organisation	Comment Received	Council Response
Natural Resources Wales	<p><u>Section 5.2.1</u></p> <p>We recommend that wording is added to the flood risk section affirming that highly vulnerable development should not be permitted in Zone C2 of the Development Advice Map contained in TAN15, (paragraph 6.2 of TAN15). Tourism and leisure developments could include campsites, conversions of barns to holiday lets, wedding venues with overnight accommodation and so on, which are considered highly vulnerable development.</p> <p><u>Section 7.4.1</u></p> <p>We recommend that wording is added to this section on camping and caravan sites regarding WG Circular 008/2018 on private drainage, and specifically paragraphs 2.3-2.5, which stress the first presumption must be to provide a system of foul drainage discharging into a public sewer.</p>	<p>The comments made by NRW are noted and the following amendments are proposed:</p> <p>Amend paragraph 5.2.1 as follows:</p> <p>Welsh Government guidance states that new development should be directed away from those areas which are at high risk of flooding. It is very unlikely that new tourism and leisure related developments will be able to be justified against the tests set out in TAN 15 Development and Flood Risk. Accordingly, new development should be directed away from Zone C and towards suitable land in either Zone A or Zone B, where river or coastal flooding is less of a concern. <u>In particular, highly vulnerable development should not be permitted in Zone C2 of the Development Advice Map contained in TAN 15 (paragraph 6.2 of TAN 15 refers). Tourism and leisure developments could include campsites, conversions of barns to holiday lets, wedding venues with overnight accommodation etc., which are considered to be highly vulnerable development.</u></p> <p>Amend paragraph 7.4.1 as follows:</p> <p>Proposals for new camping and caravan sites (including supporting infrastructure) should be sited unobtrusively to minimise the visual impact on the countryside or coast. Consideration must also be given to the impact on historic or cultural heritage, biodiversity and local amenity, noise and traffic generation. The provision of essential services</p>

		<p>such as water supply and sewerage facilities must also be taken into account. <u>Welsh Government Circular 008/2018 on private drainage, (specifically paragraphs 2.3-2.5), states that the first presumption must be to provide a system of foul drainage discharging into a public sewer.</u></p>
<p>Glamorgan Gwent Archaeological Trust (GGAT)</p>	<p>Thank you for consulting us on this document for supplementary planning guidance.</p> <p>The draft SPG mentions that areas are noted within the Vale of Glamorgan as Heritage Coast, and it is important to note that this designation is also for the archaeological and historic environment reasons within such areas. This includes sites such as the prehistoric coastal enclosures and hillforts, evidence of Roman maritime, farming and military activity, and the standing castles, churches and other buildings of Medieval date within historic settlements such as Llantwit Major, Ogmores-by-Sea, and Aberthaw.</p> <p>Also noted is the legislative framework and policy context that has relevance to the historic environment. TAN 24: The Historic Environment is noted, but only in reference to designated historic assets. TAN24 also refers to non-designated assets and their management in development. Objective 4, historic environment, in the LDP's key strategic objectives is mentioned, noting the benefit of the assets which are valued by residents and visitors.</p> <p>There are different impacts that tourism and leisure development may have on the historic environment, and both positive and negative impacts, and this should be noted as a consideration.</p> <p>Differing potential for development can include new buildings and facilities including parking, information and signage, footpaths and</p>	<p>The comments made by GGAT are noted and the following amendments are proposed:</p> <p>Amend paragraph 7.12.1 as follows:</p> <p>The Glamorgan Heritage Coast was designated by the former Countryside Commission in 1972 and covers a 23km stretch of coastline in the Vale of Glamorgan between St. Athan in the east and Ogmores by Sea in the west (See Appendix 2). The purpose of the designation is <u>The Glamorgan Heritage Coast was designated not only for archaeological and historic environment reasons but also</u> to ensure that the special environmental qualities of this section of undeveloped coastline are properly managed and protected. This approach is echoed in PPW (Paragraphs 5.7.4 and 11.1.6 <u>6.5.12</u>) and in the Adopted LDP (Policy MG 27 refers).</p> <p>Amend paragraph 4.2.11 as follows:</p> <p>TAN 24 provides detailed guidance on how different aspects of the historic environment such as listed buildings, scheduled monuments, conservation areas and historic landscapes etc. should be considered by owners, developers and public bodies in the planning process. <u>The TAN also refers to non-designated assets and their management in development.</u> This is particularly important as the Vale of Glamorgan has a significant number of historic assets <u>as well as non-designated assets</u> which could be <u>positively or negatively</u> affected by proposals for new tourism and leisure development. <u>In terms of the historic environment, potential tourism and leisure development proposals could include new buildings and associated facilities such as parking, information boards, signage, footpaths and trails or the conversion of</u></p>

trails, conversions of historic buildings, and maintenance of historic buildings and structures that attract resident, visitor and leisure use, for example castles, churches, piers, and earthworks sites such as coastal remains.

Any development may have a physical impact on any buried archaeological resource, both designated and non-designated sites or areas, potentially with a need for archaeological mitigation; larger parking areas or new builds may have a visual impact on historic assets, both designated and non-designated. Changes to historic buildings or structures, whether designated or not, may have both physical and visual impact which should be considered. Conversion of buildings to accommodation may also require mitigation by historic building recording, or archaeological fieldwork depending on the archaeological resource.

There are also promotional opportunities, as acknowledged in the draft, where information boards or interactive signage relating to the historic surroundings can be installed to footpaths, parking, and caravan or camp sites.

It is likely that some developments will require planning or listed building permission, and consultation with ourselves at early stage, as your Authority's archaeological advisors, is strongly advised; we can then supply any appropriate recommendations for mitigation. As noted, for sites with non-statutory designations, archaeological mitigation work may be required both pre and post determination to ensure that development complies with the newly released Planning Policy Wales Edition 10 December 2018, Chapter 6: Distinctive and Natural Places, and the TAN24: The Historic Environment.

The impact on designated historic assets and their setting is dealt with by Cadw, who must be consulted if any development is

existing historic buildings and maintenance of historic buildings / structures that attract visitors such as castles, churches, piers and earthworks sites such as coastal remains.

5.5 Heritage –

Paragraph 5.5.1:

The Vale of Glamorgan has a rich and diverse cultural heritage and its heritage assets are widely dispersed throughout the authority. New tourism and leisure proposals should therefore ensure that the archaeological, architectural, historic and / or cultural assets of the Vale of Glamorgan are conserved and where appropriate enhanced. Where applicable, development proposals should consider the impact **not only on the heritage asset but also it's on the setting of a heritage asset** including any significant views into or out of it, which in many cases are as important as the heritage asset itself. **Further advice on this matter can be obtained from Cadw (www.cadw.gov.wales).**

Insert new paragraph 5.5.2 and re-number subsequent paragraph numbers:

5.5.2 Any development may have a physical impact on any buried archaeological resource, both designated and non-designated sites or areas, potentially with a need for archaeological mitigation; larger parking areas or new buildings may have a visual impact on historic assets, both designated and non-designated. Changes to historic buildings or structures, whether designated or not, may have both physical and visual impact which should be considered. Conversion of historic buildings to new tourism or leisure uses may also require mitigation by historic building recording, or archaeological fieldwork depending on the archaeological resource. Where applicable, it is recommended that further information regarding archaeological mitigation is obtained from Glamorgan Gwent Archaeological Trust Ltd. (www.ggat.org.uk).

	<p>proposed that may impact Scheduled Monuments, or Registered Historic Landscapes. These responses are necessary to enable the management of impacts on the archaeological resource and cultural heritage.</p> <p>If archaeological mitigation work proves necessary, it is our Policy to recommend that all archaeological work undertaken in relation to planning and development issues should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists and it is our Policy to recommend that either a Registered Organisation with the CIfA or a member with MCIfA level membership should undertake the work (www.archaeologists.net/cifa and www.archaeologists.net/ro).</p> <p>Thank you for the opportunity to comment, please do not hesitate to contact us if you require further advice or information.</p>	
Barry Town Council	<ol style="list-style-type: none"> 1. Overall the draft SPG on Tourism and Leisure is well written and clearly indicates the enthusiasm that the VOG Council have for supporting tourism and leisure development. 2. Would a site specific tourist development plan be considered as the SPG text is quite generic in its approach, for example Barry Island – there should be some safeguarding of the facilities at Barry Island in respect of Tourism and Leisure – consideration should be given to more overnight accommodation being available on the Island and in the town and Barry should be promoted as a place to stay and not just for day trips. 3. The draft SPG places great emphasis upon the Vale of Glamorgan as a whole and ignores the attractions/facilities of Barry. Emphasis has been placed on the VAO rural areas in relation to tourism and leisure with little or no emphasis being placed on the tourism and leisure offered by towns such as Barry and Penarth (as seaside towns). This needs to be addressed. 	<p>Noted. Support is welcomed.</p> <p>There is currently no intention to prepare site specific tourist development plans for areas such as Barry Island. However, the Council’s Destination Management Plan refers to specific tourist areas in the Vale of Glamorgan including Barry and Barry Island and aims to improve and expand the range of visitor accommodation currently available. LDP policies SP11 and MD13 seek to safeguard and enhance existing tourism and leisure facilities.</p> <p>Noted. The introduction refers to the importance of traditional sea side destinations such as Barry Island and Penarth in relation to tourism and leisure.</p> <p>However, the following amendments aim to address this point:</p> <p>Amend paragraph 5.1.1 as follows:</p>

	<p>4. The process of seeking new developments is well presented and focuses on constraints that need to be addressed.</p> <p>5. There does not appear to be reference to any influence or policy relating to the Wales Tourist Board (WTB) in the text. A visit to WTV website gave a quote from Maggie Farrell (Novelist); "The Vale of Glamorgan is one of the few places in Britain where it is possible to have a real old fashioned bucket and spade holiday." Is this what tourists want today?</p>	<p>The tourism vision for the Vale of Glamorgan set out in the Destination Management Plan (see paragraph 4.3.9 above) helps to define ambitions and priorities that will greatly contribute to future tourism growth <u>particularly in areas such as Barry and Barry Island, Penarth, the Glamorgan Heritage Coast and the Rural Vale.</u> The LDP seeks to build on this vision by favouring new or enhanced development proposals which promote the Vale of Glamorgan as an attractive tourism and leisure destination and resists the loss of existing tourism and leisure facilities (objective 9, policies SP 11 and MD 13 refer). <u>The importance of Tourism and Leisure in settlements such as Barry, Cowbridge, Llantwit Major, Penarth as well as the minor rural settlements is also noted in the LDP area objectives.</u></p> <p>Amend paragraph 5.1.2 as follows:</p> <p>Notwithstanding the above, it is important that new rural tourism and leisure development is appropriately located and sympathetic in nature and scale to the local environment and to the needs of both visitors and the local community. Proposals for new tourism and leisure development will be assessed in accordance with the relevant LDP policies / SPG together with any relevant material planning considerations as set out below. However, it should be noted that the following list is not exhaustive and planning applications will be dealt with on a case by case basis.</p> <p>Noted. Support is welcomed.</p> <p>Visit Wales were directly consulted on the draft Tourism and Leisure SPG and were one of the partners in the Vale of Glamorgan Destination Management Partnership. In 2016, the Council in partnership with Visit Wales commissioned a Visitor Survey to understand the profile, attitude and satisfaction levels of visitors to the Vale of Glamorgan. In terms of motivation for visiting and activities undertaken, the most popular</p>
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	<p>6. Implications for Barry – The WTB website talks of beaches on the South Wales Coast (Discover the Wales Coastal Path) but only refers to the stretch from Aberthaw to Porthcawl. Could the VOG Council highlight this with WTB, emphasising the attraction of Barry beaches.</p> <p>7. The SPG describes the vale as “the green lung of South East Wales” and the protection of the environment is paramount to retain this title but advocating large scale Biomass energy plants (Renewable Energy SPG) appears at odds with this statement.</p> <p>8. Have the VOG Council considered maximising parking on Barry Island. This could be considered by providing a multi-storey car park on the current car park at Harbour Road.</p>	<p>activity by far was visiting the beach (60%). Nevertheless, the LDP policies seek to enhance the range and choice of the Vale of Glamorgan’s tourism and leisure opportunities, particularly through the provision of all year round facilities.</p> <p>Noted.</p> <p>The Renewable Energy SPG does not promote large scale Biomass energy plants where they would have an unacceptable impact upon the environment but rather outlines the different planning considerations that would need to be assessed to help a future applicant which includes assessing air quality. Furthermore, the green lung refers to the rural areas of the Vale of Glamorgan where a biomass plant would be less likely to come forward. The Renewable Energy SPG seeks to direct Biomass development to more appropriate areas such as existing industrial land (see para.7.3.7 of Renewable Energy SPG).</p> <p>No change required.</p> <p>Car parking provision on Barry Island is currently being considered holistically by the Council as part of a wider scheme.</p>
<p>Jon Brown Designing out Crime Officer Territorial Policing Hub South Wales Police Headquarters</p>	<p>Include section on Safety and Security</p> <p>It is important that any new buildings are designed to be safe and secure, this is particularly important in many tourist locations as they may be in isolated or vulnerable locations where they are not always well over looked. As well as considering designing out crime consideration should be given as to how to develop activities which would increase legitimate use of areas for tourism and recreational purposes and how this may increase the levels of surveillance and capable guardianship. Advice can be obtained</p>	<p>The comments of the Designing out Crime Officer of South Wales Police are noted and accepted. Include new Section 7.15 and paragraph 7.15.1 as follows:</p> <p><u>7.15 Security</u></p> <p><u>7.15.1 It is important that any new buildings are designed to be safe and secure, this is particularly important in many tourist locations as they may be in isolated or vulnerable locations where they are not always well over looked. As well as considering designing out crime</u></p>

	from Police Design Out Crime Officer or from Secured by Design (SBD).	<p><u>consideration should be given as to how to develop activities which would increase legitimate use of areas for tourism and recreational purposes and how this may increase the levels of surveillance and capable guardianship. Further advice can be obtained from the South Wales Police’s Designing Out Crime Officer or from Secured by Design (www.securedbydesign.com).</u></p> <p>In addition, add contact details of the Designing Out Crime Officer to the Further Information and Advice section of the SPG.</p>
Friends of the Earth	<p>Needs to give policies/standards applying to various sections of the coastal path in the VoG including which are to be available to cyclists. Where sections have one-way traffic, contraflow arrangements will be made for cyclists.</p> <p>Needs to say what areas are considered to be coastal zone as used in TAN 14</p>	<p>The Wales Coastal Path is covered in section 5.11 of the SPG. The SPG recognises that the Wales Coastal Path provides leisure and recreational opportunities for both visitors and tourists alike. Cycling is not legally allowed on public footpaths. In addition, the informal nature of much of the path and the existence of structures such as gates and stiles can make it impractical for bicycles. Nevertheless, there are various sections of bridleway as well as dedicated cycleways (including parts of the NCN) on many parts of the path or nearby. The NCN route (completed and proposed) is already shown on the LDP proposals map.</p> <p>TAN 14 is considered to be outdated having been prepared in 1998. The LDP coastal policies (SP 11, MG 27 and MD 7) were informed by a Coastal Study and other relevant documentation such as the Severn Estuary Shoreline Management Plan 2 (2010) and Lavernock Point to St. Ann’s Head Shoreline Management Plan 2 (2012). The LDP policies reflect the characteristics of the coastline and acknowledge that some coastal areas are suitable for appropriate development (e.g. Barry) whereas a more restrictive approach is applied in other coastal areas (e.g. Glamorgan Heritage Coast). The LDP Inspector was satisfied with this approach and only the Glamorgan Heritage Coast boundary is therefore shown on the LDP proposals map and in the SPG.</p>
Parking Standards SPG		
Organisation	Comment Received	Council Response
Mrs A.Flinn	Neighbourhood watch has most complaints about street parking. Re: Car Parking – Planning when new houses/housing estates	Comments noted. No change required.

	<p>needs to be reviewed.</p> <p><u>Suggestion:</u> Instead of pretty grassed areas and street trees, car bays should replace them because society has changed Re: car ownership each family. <u>OR</u> No front gardens – car parking bays instead. This would relieve police and council involvement with car parking complaints/accidents.</p> <p><u>Re: Car Parking Charges</u> – Barry has not got the retail infrastructure to attract people to Barry. There is no attraction to visit and less will visit it.</p>	
Barry Town Council (BTC)	<p>1. Overall the draft SPG on Parking Standards is detailed in factual and technical information which for a developer is ideal. However, this makes it a difficult read for the layman.</p> <p>2. The overwhelming level of different car parking standards, technical information and details of specific parking zones – Barry Town Council’s Planning Officer found it difficult to access the relevant zone plan – again this makes access and understanding by the general public difficult and could lead to confusion.</p> <p>3. It is clear that the key car parking standards are fairly constant across similar authorities such as Bridgend Council who have adopted very similar provisions.</p> <p>4. Implications for Barry – Clearly central Barry Town Centre falls within Zone A Parking Zones. This has implications for future centralised development/redevelopment e.g. Members will recall the new development at St Paul’s Church. There were 18 proposed car parking spaces in the submitted plans. The notes on the SPG for car parking in new residential developments states: “No Parking court may accommodate more than 12 parking spaces”. (DPS SPG Page 21).</p>	<p>1. The comments of BTC are noted however it is considered that the Parking Guidelines Supplementary Planning Guidance document <u>is</u> largely a technical document and while every effort is made by the Council to make it accessible and easily understood sometimes technical elements are unavoidable.</p> <p>No change required.</p> <p>2. The comments of Barry Town Council in respect of the difficulties encountered with the mapping of the parking zones are noted. Officers would advise that following contact from the BTC during the consultation, large scale paper plans were provided to aid the BTC planning officer’s response. <u>In addition it is proposed to include a link within the revised SPG at paragraph 6.1.4 to an interactive plan which enables more detailed consideration of the parking zones.</u></p> <p>3. The comments of BTC are noted.</p> <p>No change required.</p> <p>4. While not commenting on specific planning applications, in respect of ‘parking courts’ the SPG is considered to reflect the guidance contained with the Department of Transport’s Manual for Streets document which at paragraph 4.6.3 states ‘That where parking courts are used, they should be small and have natural surveillance.’ As mentioned by the BTC in their comments (3) the parking standards have been developed by a regional working group (County Surveyors Society 2008) and have generally been adopted by most local planning authorities and the</p>

	<p>5. The use of parking standard example would enhance the SPG. The VOG did provide examples in the 2015 SPG but fail to do in latest version. This would greatly improve the clarity of the subject.</p> <p>6. The lack of photographs to indicate relevant point/detail in the SPG is clearly evident and their use can enhance the transparency of any arguments/points.</p> <p>7. There needs to be a clear link between traffic levels and the environmental impacts.</p>	<p>content is therefore considered to be appropriate. Notwithstanding the above, the Council accepts that the inclusion of the figure '12' in relation to parking courts would seem arbitrary and does not accurately reflect the guidance referenced. It is therefore proposed to amend paragraph 10.1 as follows:</p> <p>Amend paragraph 10.1 (Notes) as follows:</p> <p>1. Curtilage parking must be provided wherever possible. Where communal parking is provided, it must be conveniently sited and should be in a location that is also overlooked which will thereby enhance its security. Where parking courts are provided they should follow the guidance contained in Manual for Streets (paragraph 4.6.3 refers) No parking court may accommodate more than 12 parking spaces and depending on local context, designated parking secured by a lockable bollard or other means may be required. Safe pedestrian access must be provided between each dwelling unit and its parking space.</p> <p>5. The 2015 version of the Parking Guidelines included specific examples illustrating parking requirements in respect of a number of different types of development based on a sustainability assessment. This sustainability assessment has been removed from the latest SPG in favour of a more flexible approach allied to the use of maximum standards as promoted in PPW 10. The use of specific examples is therefore not considered to be appropriate. No change required.</p> <p>6. The comments of BTC are noted however as already accepted, the majority of the SPG is largely technical in nature and seeks to illustrate the level of parking requirements associated with new development and changes of use. While photographs could be used to illustrate design matters, it is difficult to see how photographs could be used to interpret levels of parking as set out within Section 10 which forms the core of the SPG. No change required.</p> <p>7. While the comments of the BTC are noted, the SPG has been prepared to provide additional information on the Council's</p>
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	<p>8. Residents referred to the conversion of Churches – where VOG have allowed conversions to have on street car parking. This position is not sustainable and often VOG have failed to ensure any existing off street facilities are retained for parking provision.</p> <p>9. In the past there have been discussions around upgrade the multi-storey car park at Holton Road, Barry. Barry Town Council would welcome the upgrade of this facility to a more user friendly service. Since this car park was introduced car sizes have increased and many people find difficulty in getting in and out of the car park. There are signs on the top floors advising that fire extinguishers are on the ground level, the Welsh translation of the car park “free” is incorrect and means “prison”.</p> <p>10. With regard to the proposals for the EVECS, technology in relation to this is relatively new and is progress at a considerable rate. Is it prudent to oversubscribe such schemes when the technology is changing so fast?</p>	<p>requirements for car parking associated with new development and changes of use and is not traffic. Notwithstanding this, the underlying philosophy of the SPG as referenced in both the introduction and section 5 is the need to utilise more sustainable modes of transport and this is reflected in the application of ‘maximum’ parking standards which are generally considered to lower the levels of car parking and encourage more sustainable transport use. No change required.</p> <p>8. While the comments of the BTC are noted, planning applications for new development will always be considered on their individual merits and with regard to local circumstances and need. In this regard, where such matters have previously been allowed, this will be following full and detailed consideration of local circumstances and the submission and consideration of any relevant supporting information e.g. parking surveys. This approach is considered to be in line with Planning Policy Wales which at paragraph 4.1.51 states that ‘Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. No change required.</p> <p>9. The comments of the BTC in respect of Holton Road car park are noted but are not considered to be relevant to the SPG. Officers will however pass the comments of the BTC onto the relevant officer/department for consideration. No change required.</p> <p>10. The Council notes the comments of the BTC. While it is accepted that EVCPs are developing at a significant rate, the technology is well advanced and reliable and has been extensively deployed throughout the UK. While it is acknowledged that at some time in the future a standardised approach to equipment may be adopted, this is not considered to be a reason to prevent its adoption. The availability of</p>
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		<p>electric vehicle charging points will not only create greater awareness of electric vehicles, but can also influence and encourage members of the public to adopt the technology.</p> <p>No change required.</p>
<p>Glamorgan Gwent Archaeological Trust (GGAT)</p>	<p>Thank you for consulting us on this document for supplementary planning guidance.</p> <p>Within this there is no apparent mention of the Adopted LDP's key strategic objectives Objective 4, To Protect and Enhance the Vale of Glamorgan's Historic, Built, and Natural Environment. However, whilst a parking strategy may not appear to impact on this Objective, there are issues where it may. Any impact that the Parking Standards may have on the archaeological resource should be noted as a consideration.</p> <p>The creation of any parking strategy in relation to the historic environment raises two issues.</p> <p>Firstly, there is the impact that large scale parking may have on any buried archaeological resource, potentially with a need for archaeological mitigation;</p> <p>Secondly, large parking areas may have a visual impact on historic assets, both designated and non-designated.</p> <p>There is also the opportunity to include within parking areas any information concerning the historic environment in the vicinity.</p> <p>It is perhaps likely that some larger parking may require planning permission, but not all, and consultation with ourselves at early stage is advised; we can then supply any recommendations for mitigation. For sites with non-statutory designations, archaeological mitigation work may be required both pre and post determination to ensure that development complies with the newly released Planning Policy Wales Edition 10 December 2018,</p>	<p>While the comments of the Glamorgan Gwent Archaeological Trust are noted.</p> <p>The Parking Guidelines Supplementary Planning Guidance (SPG) has been prepared to expand upon the policies of the Local Development Plan and sets out the Council's required standards for parking associated with new development. While it is accepted that the parking provision associated with new development proposals could adversely impact upon the archaeological resource, it is not considered to be the role of the parking guidelines SPG to address these issues. All new development proposals will be considered against the objectives and policies of the adopted LDP which includes Objective 4, To Protect and Enhance the Vale of Glamorgan's Historic, Built and Natural Environment and more specifically, Policy MD8 Historic Environment, which seeks to ensure that the unique built and historic environment of the Vale of Glamorgan is protected and enhanced. Criterion (4) of Policy MD8 is also specific to sites of archaeological interest and their settings. Where issues in respect of the archaeological or historic environment are identified, GGAT and/or Cadw are consulted through the normal development management procedures.</p> <p>It is considered therefore that the issues raised by the GGAT in their representation are not relevant to the SPG and would be adequately addressed through the normal application of the LDP policies.</p> <p>No change required.</p>

	<p>Chapter 6: Distinctive and Natural Places, and the TAN24: The Historic Environment.</p> <p>The impact on designated historic assets and their setting is dealt with by Cadw, who must be consulted if any development is proposed that may impact Scheduled Monuments, or Registered Historic Landscapes. These responses are necessary to enable the management of impacts on the archaeological resource and cultural heritage.</p> <p>If archaeological mitigation work proves necessary, it is our policy to recommend that all archaeological work undertaken in relation to planning and development issues should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists and it is our Policy to recommend that either a Registered Organisation with the ClfA or a member with MCIfA level membership should undertake the work (www.archaeologists.net/cifa and www.archaeologists.net/ro).</p> <p>Thank you for the opportunity to comment, please do not hesitate to contact us if you require further advice or information.</p>	
<p>Jon Brown Designing out Crime Officer Territorial Policing Hub South Wales Police Headquarters</p>	<p>Would suggest amending para 4.2.11 to include the following;</p> <p>Car parking needs to be designed with security and safety in mind, all parking and cycle stands need to be positioned where it can be well overlooked with adequate street lighting provision to enhance personal safety and prevent crime. Further advice on design and layout of parking including secure cycle storage can be obtained from police Design Out Crime Officer or www.securedbydesign.com</p>	<p>The comments of the Designing out Crime officer are noted and accepted. However paragraph 4.2.11 is a direct reference from the Welsh Government TAN 18 Transport and cannot be amended. However the following change is proposed:</p> <p>Add new paragraph 5.12 as follows:</p> <p><u>5.12 All car parking should be designed with security in mind and all parking and cycle stands should be positioned where they can be well overlooked with adequate street lighting provision to enhance personal safety and prevent crime. Further advice on design and layout of parking including secure cycle storage can be obtained from police Design Out Crime Officer or www.securedbydesign.com</u></p>

		<p>Add contact details of the Designing out Crime Officer in section 9 Further Advice and Contacts as follows:</p> <p><u>Designing out Crime Officer</u> <u>South Wales Police</u> <u>Territorial Policing Hub</u> <u>South Wales Police Headquarters</u></p> <p><u>Tel: 01656 655555 Ext: 29251</u> <u>Jon.Brown@south-wales.pnn.police.uk</u></p>
<p>Cllr Ian Johnson</p>	<p>Parking Standards Draft SPG. December 2018.</p> <p>The SPG makes the assumption (para 1.1.) that residents make a neutral choice between car use and public transport, in favour of the former over the latter. In reality, even in the most ‘sustainable’ of locations close to hubs, public transport use is limited by routes and timings of services which restrict employment options and leisure opportunities, as well as the ability to best manage family caring commitments. It is unrealistic that the planning system can successfully remove the car from locations without a concurrent substantial investment in a fit for purpose public transport system.</p> <p>This assumption regarding car use impacts upon the actual use of vehicles by local residents in so-called sustainable locations such as Barry town centre. Unlike major agglomerations, Barry many town centre residents have their main place of employment elsewhere and require a vehicle to reach work or for family caring needs. Consequently the suggestion that there should not be a ‘minimum’ requirement for parking is to negate reality and store up problems for existing and future residents. This should be reconsidered.</p>	<p>While the SPG cannot directly affect the way in which individuals meet their own transport needs and utilise private vehicles and/or public transport, it can through the application of the standards set out in the SPG seek to affect elements of personal travel associated with land use through the reduction in the availability of car parking. While this in itself will never fully address the over reliance on private vehicles over more sustainable modes of transport, it is a positive approach that can contribute to wider more strategic approaches and investment being progressed by the local authority and other agencies including the Welsh Government.</p> <p>No change required.</p> <p>The use of ‘maximum’ standards for parking is contained within the revised Planning Policy Wales (Edition 10) (PPW) at paragraph 4.1.53 which states that: ‘Local authorities should develop an integrated strategy on parking to support the overall transport and locational policies of the development plan. Local authorities should consider parking issues on a joint basis with neighbouring authorities. They should jointly establish maximum levels of parking for broad classes of development, together with a threshold size of development above which such levels will apply. These maximum standards should be set in collaboration with interested organisations. Local authorities will need to ensure that their parking standards reflect local transport provision, are adopted by individual authorities as supplementary planning</p>

I agree with the proposal to undertake car parking surveys over a period of time avoiding times and dates which might produce outlier findings (para 5.7).

Reference is made to the use of a fall-back position (para 5.8) in which the previous use of a location is used to support the assertion that a new use requires less parking than before. This should be time limited as new behaviour norms will have become established in the meantime.

From the map provided at para 6.2, it appears that Barry Island has been designated as a suburban area. In light of the high parking requirements, particularly during the Summer months and at special events, it should be considered if the characteristics of the location make it more appropriately described as 'urban'.

Paragraph 10.1 refers to parking standards by land use. The notes relating to residential parking standards say that 'no parking court

guidance, and are kept under review. Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high quality places.' The Council considers that the SPG as current draft fully complies with the policy stance set out in PPW. The parking standards have been developed by a regional working group (County Surveyors Society 2008) and include 'maximum standards' which actively seek to reduce the attractiveness and reliance of the private car.

No change required.

Support is welcomed.

Comments noted and accepted.

Insert new sentence at para 5.8 as follows:

"However, if sites have been vacant or uses abandoned this 'fall-back' position will have limited weight in assessing parking demand for new development.

Barry Island does not fit appropriately with the 'Urban' Zone description which assumes close connections to a full range of services and frequent public transport and is far better suited to its current designation Zone C - Suburban or Near Urban. i.e. This zone comprises the outer edges of the largest towns; suburban locations in towns; the whole of smaller settlements offering a range of local facilities. There is an at least hourly bus service to the town centre and there may also be a railway station in the town. Local facilities include a local centre within 400m walking distance. Some other basic amenities such as a doctor's surgery are also available within the same walking distance.

No change required.

While not wishing to comment on specific planning applications, with regard to 'parking courts' the SPG is considered to reflect the guidance

	<p>may accommodate more than 12 spaces'. The reason for this is unclear and its practical application is uncertain. A number of previous and current planning applications, e.g. Newbourne Court, Barry, include greater capacity than this. This appears in contest with the previous table which suggests 1 parking space per apartment bedroom and 1 visitor space per 5 units, and appears to suggest that the greater the number of bedrooms and apartments the lower the percentage of potential car ownership.</p> <p>I am happy to expand upon any of the above points as required.</p>	<p>contained with the Department of Transports Manual for Streets document which at paragraph 4.6.3 states 'That where parking courts are used, they should be small and have natural surveillance.' With regard to the specific figure included within the SPG, the parking standards have been developed by a regional working group (County Surveyors Society 2008) and have generally been adopted by most local planning authorities. The figure identified is therefore considered to have been fully considered and be set at an appropriate level. With regard to the discrepancies between the applications mentioned, the SPG is guidance and will only ever be the starting point for detailed considerations and planning applications will always be considered on their individual merits and with regard to local circumstances and this can in certain instances necessitate deviation from approved guidance. Notwithstanding the above, the Council accepts that the inclusion of the figure '12' would seem arbitrary and does not accurately reflect the guidance referenced. It is therefore proposed to amend paragraph 10.1 as follows:</p> <p>Amend paragraph 10.1 (Notes) as follows:</p> <p>1. Curtilage parking must be provided wherever possible. Where communal parking is provided, it must be conveniently sited and should be in a location that is also overlooked which will thereby enhance its security. <u>Where parking courts are provided they should follow the guidance contained in Manual for Streets (paragraph 4.6.3 refers) – No parking court may accommodate more than 12 parking spaces</u> and depending on local context, designated parking secured by a lockable bollard or other means may be required. Safe pedestrian access must be provided between each dwelling unit and its parking space.</p>
<p>HBF (House Builders Federation)</p>	<p>HBF response to the Proposed Highway SPG</p> <p>The HBF object strongly to section 7.2 Standards of Provision for Residential Developments and in particular paras. 7.2.1 Private / Off-site parking – For residential developments of 50 units or more and 7.2.2 On-Street Communal / Visitor Parking – for residential developments of 50 units or more. This section of the document</p>	<p>The comments of the HBF in respect of the SPG are noted and accepted.</p> <p>Since the original drafting of the SPG and the start of the consultation period, the Welsh Government have published the final version of Planning Policy Wales (Edition 10)(December 2018)(PPW) and the guidance with regard to electric vehicles has been significantly</p>

introduces the requirements relating to Electric Vehicle Charging Points (EVCPs).

In terms of this being introduced in an SPG the HBF considers that this is not compliant with the Welsh Government Guidance contained within the Local development plan-manual-edition-2 which states.

7.2.2.2 Supplementary Planning Guidance (SPG) can be used to show in more detail how generic LDP policies will be interpreted although SPG should not include new policies (see sections 7.3) [7.31 The LDP contains policy; SPG contains guidance and advice only. All SPG should derive from a generic policy].

The HBF considers that the adopted LDP does not contain a policy relating to EVCP's from which this new SPG requirement can derive, so its inclusion is contrary to WG guidance.

Further the HBF notes that para 7.1.6. references offsite payment in lieu of onsite provision at a cost of £2,500 per charging unit required, it is however not clear if this would apply to residential development or not. The HBF are also concerned that if such a charge did apply to residential development it would be a duplication of the charge identified in POLICY MD4 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS at point 3. Which is outlined in the Developer Contributions SPG 2018 includes a formula for Sustainable Transport which is triggered by sites of 10 units or more and is set at £2,300/dwelling which would appear to cover the provision of EVCP's.

The only statutory requirement for EVCP's that HBF are aware of is found within the European building directive 2018 however the requirements of this are not due to be met until 2021 with an additional one-year transitional allowance. With regard to residential development the document states that 'all new and thoroughly renovated residential buildings with more than ten

amended. While the Council remains committed to the introduction of infrastructure to support the role out of electric vehicles and more sustainable modes of transport, it accepts that the requirements of the SPG go beyond that now set out in PPW and indeed the LDP.

In this regard, the Council has proposed the following amendments to the draft SPG to reflect the concerns raised by the HBF and other representors.

Amend paragraph 7.1.4 as follows:

7.1.4. Therefore, to encourage the take up of these vehicles and increase the number and geographic spread of ULEV charging infrastructure, the Council will seek to secure the necessary electric vehicle charging points (EVCPs) infrastructure, within new **non-residential** development proposals **at the standards set out in paragraph 7.2 below. For new residential development proposals, the Council will encourage developers to provide EVCP wherever appropriate at a ratio of 10% of all parking spaces provided and will work with them to ensure that any issues that arise can be addressed.**

Amend paragraph 7.1.5 as follows:

7.1.5. **Where EVCP infrastructure is provided,** Developers will ~~therefore~~ need to consider both active and passive ULEV charging points as they develop their design proposals. Such considerations would include:

- The location of charging points in relation to the development e.g. proposed residential properties, public parking areas;
- The additional requirements of charging bays e.g. additional signage, safety/protection barriers, enhanced parking bays;
- Provision of servicing/ducting within the development to power the EVCPs infrastructure;
- Dedicated EVCPs spaces with the necessary charging facilities.
- The provision of ducting and other infrastructure to allow ULEVs to be readily accommodated within parking areas in the future.

parking spaces must be equipped with the appropriate pre-wiring for a charging point to be installed in each space.’ The HBF consider that this clearly not apply to individual properties
With regard to this European requirement the HBF would advise that they have spoken to Welsh Government Building Regulations team who advise that amendments to the Building Regulations with regard to EVCP’s are likely to be consulted on later this year in order to ensure compliance with the Energy Performance of Buildings Directive 2010. However, this will only require the provision of infrastructure/ducting on certain developments.

By way of further general comment as referenced in the SPG individual property owners can access a financial contribution towards the installation of electric charging points:

<https://www.gov.uk/government/collections/government-grants-for-low-emission-vehicles#electric-vehicle-homecharge-scheme>

The HBF consider that this is enough of an incentive to the limited number of occupiers who are likely to use an electric/ hybrid vehicle to install a charging point on their house if they wish. This also deals with the issue that currently there is no industry standard for charging so the actual type of charging equipment required will depend on the type of vehicle and the owner’s requirements in terms of slow or fast charging. HBF’s understanding is that fast charge systems are likely to require a three-phase supply something which is currently not provided to residential sites and could result in a significant increase to the cost of the development.

Even though the HBF have object strongly in principle to the inclusion of this requirement in the proposed SPG we would also offer the following details comments with start of the requirements.

Regarding para 7.2.1 which requires at least 10% of car parking spaces will be required to have active EVCPs. The requirement

- Both the charge point hardware installation and necessary grid network reinforcement.

Amend paragraph 7.1.6 as follows:

7.1.6. Where on-site provision is considered appropriate but site constraints render the installation unviable, ~~developer contributions will be required in order~~ to facilitate the provision of EVCPs ~~at appropriate sites~~ **within the local** area, the use of local authority sites e.g. public car parks, leisure centres or at on street parking locations, will be considered. Based on current average cost for the installation of a typical charging unit, the contribution will be £2,500 per unit required.

Delete Section 7.2 as follows:

~~7.2. Standards of Provision for Residential Developments~~

~~7.2.1. Private / Off Street parking — For residential developments of 50 units or more :~~

- ~~• All parking spaces will be required to include passive EVCPs~~
- ~~• At least 10% of car parking spaces will be required to have active EVCPs. These must be conveniently located to the off street parking space (usually set in the property wall) that meets all relevant and current OLEV technical specifications (including a dedicated internal circuit and fuse box serving the charging point).~~

~~7.2.2. On Street Communal / Visitor Parking — for residential developments of 50 units or more, where communal / visitor parking spaces are to be provided they should be provided as passive spaces at the outset with at least 10% of all communal / visitor parking spaces being active spaces for EVCPs. All EVCPs should be located in prominent and convenient locations within communal car parking courts and be laid out and include signage, lighting and access spaces.~~

	<p>cannot be an 'at least' requirement as this offers no certainty on what might be required the wording 'at least' should be changed to 'a maximum of'.</p> <p>Para 7.2.2 the HBF notes that if an electric charging point is fitted into a communal or visitor space someone has to pay for the use of the electricity for the charging point as well as the lighting which is included in the requirement, clearly this is not possible in such a situation as each charging point would have to have its own meter and who would then be responsible for paying the bill for its usage, it should certainly not be the responsibility of the developer who is very unlikely to retrain an interest in the site once its completed and adopted. The HBF would ask are the Council willing to take on the ongoing running cost associated with these public charging points by linking them to the Street lighting network?</p> <p>HBF requested the following changes be made to the SPG. Para 2.4 should be deleted.</p> <p>Para 3.2 should be updated to reference Planning Policy wales (PPW) Edition 10.</p> <p>Paras 4.2.1 – 4.2.4 should be updated to reference Planning Policy Wales (PPW) Edition 10.</p> <p>Para 7.1.6 clarify that this does not apply to residential development.</p> <p>Paras 7.2.1 & 7.2.2 should be deleted.</p>	<p>The comments of the HBF are noted however, it is considered that the amendments made above which directly address the HBFs overriding concerns in respect of electric vehicle charging points negate the need for this amendment given that the Council remain committed to the provision of such infrastructure.</p> <p>No change required.</p> <p>Comments noted. All references to earlier version of Planning Policy Wales in all SPG have been updated as a part of the consultation process including all relevant paragraph numbers. See note at top of table.</p> <p>Changes made accordingly.</p> <p>See above.</p> <p>See proposed changes set out above.</p> <p>See proposed changes set out above.</p> <p>See proposed changes set out above.</p>
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	<p>If the above requests are not accepted, then the following changes are suggested.</p> <p>If para 7.2.1 is retained then the first bullet point should be amended as follows:</p> <ul style="list-style-type: none"> - at least a maximum of 10% of car parking spaces will be required... <p>Para 7.2.2 clarification be provided on who will be responsible for the ongoing running cost and maintenance of such public charging facilities.</p>	<p>See proposed changes set out above.</p> <p>See proposed changes set out above.</p> <p>See proposed changes et out above.</p>
Redrow Homes	<p>Redrow Homes response to Parking Standards SPG consultation 4th January 15th February 2019.</p> <p>These representations raise significant concern to the requirements for Ultra Low Emission Vehicle Charging Points (ULEVCP) within residential development schemes of 50 units or more.</p> <p><u>Policy 'hook 'for ULEVCP</u></p> <p>PPW 10 has been published since the drafting of the SPG. The SPG references the draft PPW within it but the referenced elements of the draft PPW have been omitted/amended in the adopted PPW 10. Material regard can only be now had to this.</p> <p>National Policy in the form of PPW now states “To encourage the use of Ultra Low Emission Vehicles (ULEVs), the planning System should encourage and support the provision of ULEV charging points as part of new development. Where car parking is provided for <u>new non-residential development</u>, planning authorities should seek a minimum of 10% of car parking spaces to have ULEV charging points. Planning authorities should ensure the level,</p>	<p>The comments of the Redrow Homes in respect of the SPG are noted and accepted.</p> <p>Since the original drafting of the SPG and the start of the consultation period, the Welsh Government have published the final version of Planning Policy Wales (Edition 10) (December 2018) (PPW) and the guidance with regard to electric vehicles has been significantly amended. While the Council remains committed to the introduction of infrastructure to support the role out of electric vehicles and more sustainable modes of transport, it accepts that the requirements of the SPG go beyond that now set out in PPW and indeed the LDP.</p> <p>In this regard, the Council has proposed a number of amendments to comments raised by the HBF (see above) which it is considered also address the various issues raised by Redrow Homes.</p>

location and type of charging provision is appropriate to the scheme and local circumstances. Consideration should be given to:

- the time users are likely to be present at the site;
- the number of vehicles accessing the site;
- the number of existing charging points in the immediate and wider area; and
- other proposed emission mitigation measures“ (para 4.1.39).

PPW 10 states that “Planning authorities should take a strategic approach to ULEV charging in their area and, where appropriate, develop policies in their development plan and specify local requirements“(para 4.1.41).

The relevant local policy context is contained within the current Vale of Glamorgan LDP (2011-2026). Within the Vision “making a positive contribution towards reducing the impact of climate change by promoting sustainable development and transport” is set out. Beyond this objective 2 relates to reducing the impact of and mitigating the adverse effects of climate change and objective 3 relates to reducing the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. Neither of the text relating to these objectives mentions low emission vehicles and supporting their promotion.

Within the policies of the LDP itself policies SP1, SP7, MD1, MD2, MD4 and MD5 are referenced in the SPG. None of these policies refers to low emission vehicles or supporting their promotion.

Supplementary Planning Guidance requires a policy hook to hang from and expand a policy within an adopted development plan. An SPG must be consistent with the development plan and with national planning policy. It must be noted that an SPG cannot also link to just national policy alone. It is not considered that there is any hook within the adopted LDP (or national policy although not relevant as the LDP does not mention it) to enable the SPG to

require new developments to make provision for ULEV charging.

Proposed Standards of Provision for Residential Developments

Para 7.2.1 There is no evidence of why 50 units is an appropriate threshold. Simply, why would a scheme of 49 units not require any provision but a scheme of 50 units then require 10% of all parking spaces to include EVCPs?

Para 7.2.1 and 7.2.2 All parking spaces (private and communal) requiring passive EVCPs is not supported and would unlikely be utilised in the future. Lying 'spare' ducting for another to utilise at some stage in the future is not considered appropriate. This being because: the route of cabling that is preferred would be unknown at the point of ducting installation; whether the EVCP infrastructure would require wayleaves/easements (now or in future) may not be in place dependant on where ducting is laid and so could not be used in any case; the EVCP provider would be unaware of the ducting existence/location once a developer has left a site; why should a developer purchase and install ducting for something that may never be used; the already significant issues of available space within footways/service margins for gas/electric/water/telecoms/broadband etc. and installing empty ducting (and ability to easily access again) is not sensible. Will the Council adopt roads/footways with empty ducting laid or indeed with the infrastructure laid for active EVCP? For the on-street communal/visitor parking the EVCP would need to be within the adopted highway and so would the Council take responsibility for these and ensuring power capabilities for its retention etc.

Para 7.2.1 At least 10% of car parking spaces (private and communal) will be required to have active EVCPs. It is presumed that this proposal relates to 10% of plots rather than parking spaces? Why is 10% appropriate?

Notwithstanding the above other observations are made as

follows (relating to proposed Standards of Provision for Residential Developments):

- This SPG introduces additional expenditure to a development that wasn't considered at the viability testing at the LDP stage and which informed the LDP policies. It is inappropriate to introduce a new S106 matter now. Does it meet the CIL tests to mitigate the impact of the development? Redrow would suggest it does not given that there is no policy reference, or supporting text, within the LDP.

- Stipulating that a certain number of units on a development scheme are installed with charging points does not mean that the occupiers will utilise them. What if a neighbour who hadn't had it installed was interested but just needed that initial encourage. Incentivising new occupiers for selecting a charging point at a reduced/nil cost would be more appropriate i.e. units would be built with them for the occupiers that want them rather than being lucky enough to be one of the 10%. This can still be controlled via the S106 process and would likely result in greater take up of EVCPs on new development sites.

Conclusion

PPW 10 does encourage the support and provision for EVCPs. However, it only suggests that non-residential development should seek 10% provision currently and LPAs should take a strategic approach to developing policies in their development plans. The Vale of Glamorgan LDP does not do this. Redrow believes that the Council's aspirations for EVCPs within residential properties is premature.

There is also concern that the support of the utility providers for the electricity cannot currently be given to guarantee the required power levels to cope with the provision. The cost of off-site upgrade works is an unknown and again another cost to the

	<p>developer. The off-site infrastructure pressures associated with EVCPs is a serious concern that has been raised to the Welsh government by the development industry by the last 12 months. This concern may well have influenced the revised drafting of PPW 10 issued.</p> <p>Redrow is in no way against new technologies and in fact already offers Charging Points on development schemes for customers who wish to have them installed. Ultimately customers who already have electric/hybrid cars or wish to purchase them have a means when purchasing a new home to secure a charging point. It doesn't appear to be a valid cost (i.e. a necessary obligation) for money to be spent on safeguarding something (passive provision) that 'might'(but unlikely for reasoning set out above) get installed later.</p>	
RPS	<p><u>Introduction</u></p> <p>1. This technical note provides comments and feedback on The Vale of Glamorgan Council's Draft Supplementary Planning Guidance 'Parking Standards' (January 2019) document.</p> <p>2. In summary the main thrust of the document remains unchanged – to reduce the level of car parking provision at new developments with the addition of the requirement to provide infrastructure for ultralow emission vehicle charging points.</p> <p><u>Residential Parking Standards</u></p> <p>3. Paragraph 5.1 states that parking standards set out in the Draft SPG should be interpreted as maximum standards.</p> <p>4. We note that the retention of maximum parking standards for residential development is not in accordance with the CIHT/IHE document 'Guidance Note: Residential Parking' issued April 2012 in response to the previous Coalition Government's announcement to abolish maximum parking standards as they did not reduce car ownership and lead to blocked and congested streets and pavement parking causing congestion and danger to</p>	<p>While the comments of RPS in respect of maximum standards are noted, the Council would respond that the CIHT/IHE document 'Guidance Note: Residential Parking' referenced is a dated document and is not Welsh Government Policy as set out in Planning policy Wales (Edition 10)(December 2018)(PPW). This clearly states at paragraph 4.1.53 that local planning authorities should develop 'maximum standards' of parking provision.</p> <p>No change required.</p>

pedestrians. RPS considers that the approach to the provision of parking in residential developments should be reviewed and justified.

5. The document states that maximum levels of parking should only be used where some form of on street control is exercised which does not allow excessive car ownership to compromise the streets.

6. The document states it is important to recognise the fundamental difference between the provision of spaces in residential developments as Origin Parking and spaces in employment, retail and leisure developments as Destination Parking. Car ownership is not directly linked with the use of a car to travel to employment, retail and leisure uses; trips to these uses is managed by the level of provision of parking at these destinations.

7. The document states that there is no clear evidence to show that access to existing and/or proposed public transport measures and the distance from key facilities, including the quality of the walking and cycling infrastructure that provides the links, affects car ownership to the extent that these factors could be used in isolation to development a zonal approach. The Draft SPG zoning is largely based on these factors and does not consider on-street parking controls or car ownership levels which are identified as having an affect on car ownership levels.

8. RPS recommend that maximum standards are not set for residential development and that parking provision should be decided on an individual site basis and consider census car ownership levels and modal split, existing on-street control' the location of car club vehicles, and the size of the proposed dwellings.

Existing Conditions

9. Paragraph 5.7 of the Draft SPG sets out the requirement for car parking surveys to establish the existing parking demand within a local area. It is considered that the requirements set out are too prescriptive and onerous and developers could be directed to the established Lambeth Council parking Survey Guidance (https://www.lambeth.gov.uk/sites/default/files/pl-PARKING_SURVEY_GUIDANCE_NOTE_Nov_2012_Update.pdf).

Infrastructure for Ultra Low Emission Vehicle Charging Points

10. The requirements set out in Chapter 7 of the Draft SPG in respect of low emission charging points is considered to be too prescriptive. It does not enable the provision of alternative infrastructure as and when advances are made in the design and implementation of charging for electric vehicles or for an increase in the ownership of electric vehicles and the need to charge vehicles at Destination Parking.

11. Paragraph 7.1.6 of the Draft SPG sets out that a contribution of £2,500 per unit will be required if site constraints render the installation of charging points unviable. It is likely as advances are made that the associated cost will reduce. RPS recommends that a prescriptive figure is not used to ensure that contributions for development are commensurate.

12. No design details are provided for the layout of parking bays with charging points. RPS recommends that this detail is provided.

13. It is unclear whether private residential charging points are required for each dwelling or for all spaces associated with each dwelling. RPS recommends that the wording is altered to ensure understanding.

14. Paragraphs 7.2.1, 7.2.2 and 7.3.1 state that 10% of car parking is required to have active vehicle charging points. RPS considers that this figure is not justified and is too prescriptive. RPS

With regard to parking surveys requirements contained within the SPG, the parking standards have been developed by a regional working group (County Surveyors Society 2008) and have generally been adopted by most local planning authorities with some minor variations. In this regard, the requirements for parking surveys are considered to be appropriate and robust and reflect accepted guidelines throughout the region.

No change required.

The comments of RPS in respect of the SPG are noted. Since the original drafting of the SPG and the start of the consultation period, the Welsh Government have published the final version of Planning Policy Wales (Edition 10) (December 2018) (PPW) and the guidance with regard to electric vehicles has been significantly amended. While the Council remains committed to the introduction of infrastructure to support the role out of electric vehicles and more sustainable modes of transport, it accepts that the requirements of the SPG go beyond that now set out in PPW and indeed the LDP.

In this regard, the Council has proposed a number of amendments to comments raised by the HBF (see above) which it is considered also address the various issues raised by RPS.

	<p>recommends that the provision of charging points should be undertaken on a case-by-case basis.</p> <p>Travel Plans</p> <p>15. Whilst it is recognised that there is a SPG on Travel Plans, it would be useful if this Draft SPG establishes a link between Travel Plans and parking provision. It should set out that where a reduction in vehicle trips is established and achievable that parking standards may be reduced to reflect the proposed parking demand. This will ensure efficient land use.</p> <p>Parking Standards by Land Use</p> <p>16. It should be made clear within the table for each land use whether the parking standards are minimum or maximum.</p> <p>17. No standards for Parent & Child parking spaces are provide at retail uses. This should be included and supported with design details.</p> <p>18. RPS considers that the above comments are logical, practical reasonable and reflective of transport policy. Irrespective of this, we would urge a flexible approach to facilitate development and consider the parking requirements on a case-by-case basis. We trust that the comments are received, reviewed and incorporated into any amended Parking Standards and we look forward to receiving an updated copy in the future.</p>	<p>The comments in respect of Travel Plans are noted and accepted. The production and adoption of a travel plan can benefit the take up of sustainable transport.</p> <p>Include new bullet point within paragraph 5.3 as follows:</p> <ul style="list-style-type: none"> • <u>The production of an agreed travel Plan, supported by appropriate financial investment and staff commitment.</u> <p>While the comments of RPS are noted, the Council considers that the application of the standards prescribed within the SPG as maximum standards is adequately set out in the document.</p> <p>No change required.</p>
Friends of the Earth	<p>The policy suffers from high degree of uncertainty, giving the officers too much flexibility – even more than present which has been found to lead to twisting the standards and deals with the developers. Clear criteria need to be defined and applied consistently. The current definitions of urban zones 1-3 are very arbitrary and out-dated. The document must produce new ones.</p>	<p>While the comments of the representors are noted, the SPG is guidance and will only ever be the starting point for detailed considerations and planning applications will always be considered on their individual merits and with regard to local circumstances and this can in certain instances necessitate deviation from approved guidance. The application of strict criteria is therefore not considered to be appropriate. The zones descriptions defined in the revised parking</p>

		<p>standards have been developed by a regional working group (County Surveyors Society 2008) and have generally been adopted by most local planning authorities in south Wales with some minor variations. In this regard, the definitions are considered to be appropriate and new definitions are not considered to be necessary.</p> <p>No change required.</p>
<p>WRAP Around Residents' Action Group</p>	<p>Sections A, B, C are considered to relate the current planning system in Wales and to a specific planning application and subsequent appeal decision. These sections criticize the way the planning system functions and the outcome of the appeal decision. The full representation can be viewed at Appendix 5 of the Cabinet Report.</p>	<p>The comments within sections A, B and C of the representation have been noted. However, the Council considers that the content of these sections does not directly relate to the draft Parking Standards SPG as they refer to an appeal decision relating to the United Reformed Church, Barry and comments upon the national planning policy and legislation.</p> <p>An SPG document is restricted in its potential scope and can only:</p> <ul style="list-style-type: none"> • Provide important guidance to expand on topic-based policy to assist the implementation of the LDP (e.g. conservation area detailed policy). • Cover detail and numerical guidelines/thresholds where they may change so as to avoid the LDP becoming quickly outdated and to assist flexibility (e.g. car parking standards) • Provide additional detailed guidance on the type of development expected in an area allocated for development in the LDP. This could take the form of a development brief or a more design orientated master plan (LDP Manual, p.90, 2015) <p>Therefore, the contents of these sections goes beyond the possible scope of the SPG as they imply there needs to be changes in national planning policy, the legislative framework relating to the planning system and the decision making process relating to a planning application and subsequent appeal decision at the United Reformed Church, Windsor Rd, Barry. Consequently, it is considered a consultation on draft SPG documents is not the appropriate avenue to voice these concerns, issues and objections. As a result, these sections have not been responded to as part of this consultation exercise.</p> <p>No change required.</p>
	<p><i>1.1 Car parking is a major influence on the choice of means of</i></p>	<p>One aspect of the planning system is to influence how people interact</p>

transport and the pattern of new development. If car parking is readily available people are more likely to opt to use the private car instead of more sustainable forms of transport. Car parking has always been a major element of land use planning and development and through parking standards and guidelines, local authorities have sought to control car parking in order to improve the environment, reduce congestion and to encourage a shift to more sustainable modes of transport.

This smacks of un-sustainable and unrealistic social engineering, and it in no way reflects what each neighbourhood is experiencing, right now; which is where the impact from planning decisions made now will be felt. Car ownership is on the increase:

- The proportion of households with access to a car or van went from 14% in 1951 to 75% in 2010 (Department for Transport)
- The proportion of the eligible population with a full-driving license went from 48% in 1975 to 71% in 2010, but with the increase in overall population in this period this has resulted in 3.9 million more license holders (DfT)
- And locally, in the 10 years 2001 to 2011 car ownership went up 12.8% in the Vale of Glamorgan (RAC).

These are hardly trends which give confidence that people will be happy not to bring cars to a new development.

If they do not believe parking is necessary or desirable, why has the Vale allowed the building of large car parks at Tescos, Morrisons, Waitrose, Lidl and most recently ASDA's ? Surely this implies that a lot of people will have cars, a lot of people want to use them — and while there are those on bus routes who also shop 'by bus'. Through anyone's observation of usage, the provision is still evidently desired by the community...who are the people the Council and their officers should be seeking to serve....

with the built and natural environment through the management of development. The draft SPG seeks to actively promote the use of sustainable means of transport through the reduction in car parking provision, in appropriate areas, that reflect the local context of development proposals. Welsh Government has recently updated national planning policy known as Planning Policy Wales (PPW) which emphasises the need to reduce the reliance on private cars stating "The Welsh Government is committed to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation and realising the goals of the Well-being of Future Generations Act" (PPW, para.4.1.8, 2018). Although an SPG can account for local issues it must be in line with national planning policy and the LDP. PPW promotes a maximum standards approach to parking standards to aid in the reduction of car reliance stating "Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high quality places." (PPW, para.4.1.53). Additionally, paragraph 1.1 of the draft SPG is considered to reflect objective 3 of the LDP "to reduce the need for the Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" (LDP, p.26, 2017) and criterion 4 of Policy SP1 - Delivering the Strategy which promotes sustainable transport. Therefore, paragraph 1.1 of the draft SPG is considered to be in accordance with national planning policy and the objectives of the LDP.

No change required

The comments have been noted. The draft Parking Standards SPG recognises that residential and commercial developments function differently, for example a supermarket caters to a wider range of users than a residential dwelling therefore it is more likely that an element of car parking would be required at these locations. This is reflected in the different maximum parking standards set out in section 10 of the draft SPG. However, the principle of maximum parking standards still applies to all forms of development. The draft SPG seeks to promote reduced

	<p>remembering that a discrete section of those parking at the stores is made up of a significant proportion of council employees.</p> <p>If the Council serves the community adequately, and looks after all residential neighbourhoods well - then it also follows that the vehicles which visit the supermarkets etc., needed somewhere to park before they left for the shops...and according to the Planning Policy, will need somewhere near their home, and in line of sight of it...when they get home.</p>	<p>parking provision or in some cases zero parking provision in appropriate sustainable locations, where it can be demonstrated by robust evidence. Sustainable locations are characterised by accessibility to a range of facilities and services including public transport. It is the responsibility of the decision maker to assess the evidence and local context to determine how sustainable a location is and whether a lower provision of parking or zero parking would be appropriate. In this regard PPW states “Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport.” (PPW, para.4.1.51). The approach contained within the draft SPG reflects national planning policy position contained within PPW para.4.1.53 which promotes a flexible approach to parking standards. Consequently, the approach in the draft SPG is considered adequate to assess both residential and commercial forms of development in line with national planning policy.</p> <p>Additionally, TAN 12 - Design (2016) refers to the design of parking provision which should be positioned near the home and within sight of it. However, the TAN 12 goes on to state “A balance needs to be struck between the expectations of car owners, in particular the desire to park as near to houses as possible, to be secure and overlooked and the need to maintain the character of the development.” (TAN 12, para.5.11.7, 2016). There is a distinct difference between the need for parking provision and the design of parking provision. However, the representor’s statement appears to conflate the two issues which should be considered separately. Although parking should be subject to good design this does not mean that in all cases parking should be provided.</p> <p>No change required.</p>
	<p><i>1.2 (Bullet points)</i></p> <ul style="list-style-type: none"> • <i>To assist developers, designers and builders in the preparation and submission of planning applications; and</i> • <i>To achieve a common approach to the provision of vehicle parking facilities associated with new development and change of</i> 	<p>It is agreed one of the principles within national planning policy and within the adopted LDP is to improve the environment. However, national policy specifically states “Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed” (PPW, para.4.1.51, 2018). The stance of national</p>

	<p><i>use.</i></p> <ul style="list-style-type: none"> • WA New bullet point: To ensure the amenity of parking, enjoyed by existing residential communities is sustained, and/or enhanced, in accordance with the provisions for Social Sustainability within Planning Policy. <p>WA Note: Improving the environment is one of the principles for planning, hence the inclusion of ‘and/or enhanced’</p>	<p>policy in this regard aims to meet “the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport.” (PPW, para.4.1.51, 2018). PPW acknowledges that “the Welsh Government is committed to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation and realising the goals of the Well-being of Future Generations Act.” (PPW, para.4.1.8, 2018). Therefore, it is considered the current wording of the draft SPG para.1.2 reflects the approach of national policy and helps to achieve its aims of maximising environmental protection and limiting environmental impact; facilitating accessible and healthy environments in line with the Well-being goals of the Well-being and Future Generations Act (2015).</p> <p>No change required.</p>
	<p><i>This SPG has been prepared to expand upon the policies contained within the Vale of Glamorgan Local Development Plan 2011 — 2026 (LDP) and reflects the requirement set out in Planning Policy Wales (Edition 9) for local authorities to adopt parking standards as SPG and keep them under review (para 8.4.3refers).</i></p> <p><i>2.2. The guidance sets out the Council’s parking standards for new development (including change of use) that are both consistent and transparent. Parking requirements are detailed according to land use and location and list requirements for commercial vehicles, cars, motor cycles and cycles.</i></p> <p>WA Note: The use of the term ‘transparent’ cannot be applied to the vagaries of the use of ‘maximum now: minimum before’. Nor to the algorithm used, nor the process, nor the communication, nor...a number of other aspects of planning conduct. Peppering documents with ‘sustainable, transparent, and consistent’ is a waste of ink if there is no intention of delivering to the satisfaction of those served, i.e. this includes the existing residential community.</p>	<p>The previous Parking Standards SPG which was adopted in 2015 also applied maximum standards. Furthermore, the Wales Parking Standards (2008) allowed for a reduction of the parking standards where a development is in close proximity to sustainable modes of transport which was determined by set criteria. However, in the draft SPG to ensure the document is transparent it explicitly states the parking standards are to be used as maximum standards to ensure clarity for applicants, decision makers and the public.</p> <p>Additionally, the sustainability criteria which was being used in the 2015 SPG was considered to be outdated. Therefore, to ensure the longevity of the draft SPG the sustainability criteria has been removed and development proposals will now be assessed on a case by case basis relying upon appropriate and robust evidence and the local context to inform a reduction in the level of vehicle parking required.</p> <p>No change required.</p>
	<p><i>2.3. The guidance also provides information in respect of how the preparation and adoption of travel plans and/or the location of the</i></p>	<p>Travel plans are long-term management strategies for integrating proposals for sustainable travel into the planning process. The Council</p>

proposed development in relation to alternative sustainable modes of transport and local services and facilities may be taken into account in the level of parking provision required.

WA Note: What status does a travel plan have in law? Is it enforceable and how would this be done? How does it impact on a potential purchaser of a new property on a particular development, is it able to predict if they will either have or not have a private car for their own use? What recourse does the existing community have if access to their amenities is compromised, when the theoretical reduction in parking need, because of Planning taking account of the travel plan etc., does not actually materialise in practice?

WA Note: We wholly endorse the idea of using public transport, bikes, shanks' pony to mobilise and reduce pollution but the reality is that people still want to have a car outside their home to do the journeys they cannot do via public transport.

WA Note: We refer you to the evidence we provided re Romilly Quarter. In this case any amount of travel plans did not stop what has actually happened — a real average vehicle ownership much greater than use of the algorithm used by Vale Planning and Developers would suggest. The same as the average vehicle ownership, and therefore the need to park cars, and the physical kerb-space to do this, across the whole of the WRAP Around Community

WA Note: The wording should be:

...may be taken into account in the level of parking required, as long as the developer can demonstrate that the reduced level will be adequate for and fulfil all the needs for their development, and result in no over-spill. In the absence of this evidence being provided the unreduced level of parking per dwelling per bedroom up to a maximum of three car parking spaces per dwelling, as shown in the table in section...[?].will apply

WA Note: The ethos here is, develop by all means but consume your own parking smoke. When the calculation of the level of parking generated by a development produces a level which is artificially low; compared to what in reality it is most likely to be; it

has produced a Travel Plan SPG adopted in July 2018 which offers further detail regarding Travel Plans. However, in general they are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel. They are normally the outcome of Transport Assessments which evaluate the potential impacts of development proposal. It is up to the local planning authority to make a judgement as to whether a proposed development would generate significant amounts of movement, on a case by case basis, to warrant the need for a Travel Plan. However, the Travel Plan SPG (2018) contains a series of thresholds where it is likely that a Travel Plan would be required to inform developers where one would likely be needed. It is important to note that the thresholds are not exhaustive and the Council may require the submission of a travel plan in support of planning applications which fall below the stated thresholds where their impact on the local transport network is likely to be significant or where particular local circumstances exist, such as low levels of car parking.

Travel Plans themselves do not have legal standing they are usually secured by a planning condition or planning obligations (s.106 agreements). These processes do have legal standing and the local planning authority can use enforcement mechanisms such as a breach of condition notice to ensure that a Travel Plan is completed that is in accordance with national and local planning policy (Travel Plan SPG refers). To comply with national and local policy a Travel plan needs to set out clearly what data is to be collected, when it is collected, and establishing the baseline conditions in relation to any targets.

The length of time over which monitoring will occur and the frequency will depend on the nature and scale of the development and should be agreed as part of the Travel Plan with the developer or qualifying body. Who has responsibility for monitoring compliance should also be clearly set out.

Monitoring requirements should only cease when there is sufficient evidence for all parties to be sure that the travel patterns of the

	<p>would be wholly wrong under this Planning Policy to accept it...or to recommend approval of the proposal.</p>	<p>development are in line with the objectives of the Travel Plan. This includes meeting the agreed targets over a consistent period of time. At this point the Travel Plan would become a voluntary initiative.</p> <p>Based on the above and the existing wording of the draft SPG it is considered no amendment is necessary as there is already ample wording within the draft SPG to ensure that any reduction in parking standards would require appropriate and robust evidence. In terms of Travel Plans as stated the Council has already adopted a Travel Plan SPG which underwent a public consultation between the 8th May 2018 and 19th June 2018.</p> <p>No change required.</p>
	<p><i>3. Status of the Guidance</i></p> <p><i>3.1. This guidance was approved by Cabinet as a draft for public consultation on 3rd December 2018 (Minute No. C502 refers). The Council will consider the representations received during the consultation exercise before finalising the document for development management purposes.</i></p> <p>WA Note: As part of our response we have asked earlier in this paper to be involved in this process through face to face discussions and genuine collaboration in a meaningful manner. i.e. for the avoidance of doubt, before any finalising of the Planning Policy is done.</p>	<p>Comments noted. The basis for the Parking Standards SPG is founded on work undertaken by an officer working group representing the 22 local authorities in Wales who prepared the Wales Parking Standards on behalf of the County Surveyors Society (CSS) Wales in 2008. Parking guidelines based on the 2008 CSS standards were formally adopted by the Vale of Glamorgan Council as Supplementary Planning Guidance (SPG) on the 11th May 2015 (Minute No. C2769 refers). On the 28th June 2017 the Council adopted the Vale of Glamorgan Local Development Plan 2011- 2026. The draft Parking Standards SPG has therefore been updated to reflect the latest national and local planning policies, whilst using the 2008 CSS standards as a basis for parking standards associated with new developments.</p> <p>No change required.</p>
	<p><i>3.2. Planning Policy Wales (PPW) Edition 9 (November 2016) advises that SPG may be taken into account as a material consideration where it has been prepared in consultation with the general public and interested parties and is consistent with the development plan. Once adopted, the SPG will be a material consideration in the determination of future planning applications and appeals in the Vale of Glamorgan.</i></p> <p>WA Note: ‘... where it has been prepared in consultation with...’ see our earlier notes on what we feel constitutes ‘prepared in</p>	<p>The consultation for the draft SPG was undertaken in accordance with the Council’s Procedures for the Preparation and Adoption of SPGs, adopted in December 2017. The following procedure applies to public consultation on SPGs:</p> <ul style="list-style-type: none"> • For all SPG, consultations with relevant statutory consultees and other parties will be undertaken, following their approval through Cabinet as draft guidance. A 6-week period for consultation is recommended. • Following consultation, a summary of the comments and any subsequent proposed changes to the draft SPG, including a

	<p>consultation with’.</p>	<p>recommendation to adopt the SPG will be reported to Cabinet in the first instance, followed by Planning Committee.</p> <ul style="list-style-type: none"> • The views of Planning Committee (where applicable) will be referred back to Cabinet, which will take a view as to whether the SPG requires amendment prior to adoption. <p>As the draft SPG has been undertaken in accordance with the Council’s procedures it is considered an appropriate form of consultation has been used.</p> <p>No change required.</p>
	<p><i>4. Legislative and Policy Context</i> <i>4.1. National Legislation</i> <i>4.1.1. The Planning (Wales) Act 2015 - seeks to deliver a planning system which is fair, resilient, enables development and helps create sustainable places.</i> WA Note fair...and helps create sustainable places — we fully agree, but for fair the system needs a lot of improvement — see the earlier sections in this paper. And the wonderfully much-peppered word ‘sustainable’? Yes, as long as this includes Socially Sustainable, regarding the amenities currently enjoyed by existing residents.</p>	<p>Comments noted. PPW clearly defines sustainable development as “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.” (PPW, p.9, 2018). It is considered the draft SPG complies with the national planning policy contained within PPW which does acknowledge social well-being.</p> <p>No change required.</p>
	<p><i>4.1.2. Well-Being of Future Generations (Wales) Act 2015 - seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act contains seven well being goals which local authorities as well as other public bodies must seek to achieve in order to improve well-being both now and in the future. It means that for the first time, public bodies listed in the Act must do what they do in a sustainable way and make sure that when making their decisions they take into account the impact they could have on people living their lives in Wales in the future.</i> WA Note: — Again, we agree in principle. However, taking into account the impact they could have on people living their lives in Wales in the future must also require doing no harm to those living their lives in Wales...now! We have pursued and promoted a</p>	<p>Comments noted. Please see response above.</p>

	<p>Socially Sustainable agenda which is what Planning Policy tells us is our right. The experiences we have laid before you in no way suggest an improvement in well-being...so they cannot be held to have delivered on 'both now and in the future'.</p>	
	<p><i>4.2. National Policy</i> <i>4.2.1. Planning Policy Wales (Edition 9) - Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. Paragraph 8.4.1 states that in considering their requirements for traffic management, local authorities should adopt an integrated approach and consider how different measures can complement one another and contribute to the achievement of wider planning and transport objectives, taking into account the needs of the disabled and less mobile sections of the community. Within town centres priority should be given to walking, cycling, public transport and delivery vehicles through the reallocation of road space.</i></p> <p>WA Note: While we understand this point and broadly agree with the apparent aim, it must be seen in the context of:</p> <ul style="list-style-type: none"> • Technical Advice [should that be advice?] note 12: Design requirements for parking '...expectation of car owners to park near their home, particularly their desire [that their parked car] be secure and overlooked [from their property]' • '...a particular concern with reduced on-site parking is the problems associated with overspill parking' • 'Local Planning Authorities...should assess the extent of on street parking pressures and the impact of the new development' • '.... refuse permission for development — where despite controlled parking, unacceptable road safety or congestion issues would remain' • Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures. From the extracts above which are from the various policies quoted in the draft planning policy, it is acknowledged that people will have cars and they will want to 	<p>Comments noted. As stated the draft SPG provides guidance on where a proposed development which includes reduced parking provision would be refused. However, where a developer can provide appropriate and robust evidence to support the reduction in parking provision and the proposal is located in a sustainable location the proposal is likely to be approved. In regards to the planning application and subsequent approval at appeal this is a decision which has already been made prior to the consultation on the draft SPG, therefore it is considered no further comments are necessary.</p> <p>No change required.</p>

	<p>park them near to and within line of sight from their homes, which the policy specifically states is understandable and desirable...and if there is no unallocated notional allocation of kerbside parking spaces to be had, the last bullet point extract applies...although not in the WRAP Around area, apparently...feel free to explain why.</p>	
	<p><i>4.2.2. Paragraph 8.4.2 states: Car parking provision is a major influence on the choice of means of transport and the pattern of development. Local Authorities should ensure that new developments provide lower levels of parking than have generally been achieved in the past. Minimum parking standards are no longer appropriate.</i></p> <p>WA Note: If directed at the provision of multi-storey parking in town centres, to parking provision near shops and super-stores and particularly out of town venues, again fully understood. However, rather than lower levels (what on earth does that mean?!) an adequate level with no unnecessary surplus would seem to fit the bill...or policy, as needed by both business owners and those, i.e. you and me, when visiting their premises. We refer you back to the point we make above, at 4.2.1 You acknowledge in this policy that people will have cars and acknowledge there should be provision for them to park within sight of their homes. So, 'lower levels' is what, perhaps a subterranean car-park? It doesn't actually mean anything in real terms.</p>	<p>Comments noted. As outlined previously in the response above referring to TAN 12, there is a distinct difference between the need for parking provision and the design of parking where provision is considered appropriate.</p> <p>No change required.</p>
	<p><i>Technical Advice Note 12: Design (2016) - provides additional guidance and advice on enabling good design within the planning system. It recognises that parking is a consideration in design and developments should consider the requirements for parking and whether this will be managed appropriately. (our WA bold)</i></p> <p>WA Note: Thank you. Why not use this as the starting point for the review and decision-making 'tree' for the parking component of all applications? And for the avoidance of doubt, the word requirements does not refer to the Alice in wonderland type result from a let's make parking need disappear completely down this convenient kerb-side rabbit hole, calculation — it refers to a calculation of probable need trusted by, in a particular location,</p>	<p>Comments noted. The draft SPG summarises the contents of TAN 12 at para.4.2.5 and 4.2.6 and uses direct quotes from the guidance. It is considered the draft SPG has been written in accordance with the advice contained within TAN 12 and makes the distinction between the need for parking provision and the design of parking where provision is considered appropriate.</p> <p>No change required.</p>

<p>based on robust evidence.</p> <p><i>At paragraph 5.11.2 it states: Development proposals, in relation to housing design should aim to (inter alia) focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles.</i></p> <p>WA Note: Again, we agree — we like the idea that we focus on the person, the human space within their lived-in environment and not the vehicle and we agree this includes safety and good healthy living spaces, including an environment suitable for amiable ambulation. However, if the vehicle is going to be in sight of their home (as policy says it should be) and they are likely to have one or two, and want to park as near to their home as possible (as policy indicates is reasonable) then from our experience and evidence we need a minimum of 5 and probably 6 vehicle parking spaces for every three dwellings, plus space for visitors. To enable people to live their rounded life well, in every residential location — unless specifically excluded and known about and signed up to by those about to become resident, we need inclusive 360-degree holistic design, including integral provision for parking - (Living a sustainable rounded life well, for many... includes 4 tyres and a steering wheel!)</p>		<p>Comments noted. See response above in relation to the difference between design of car parking and the need for car parking provision.</p> <p>No change required.</p>
<p><i>4.2.5. Paragraph 5.11.7 states: Where and how cars are parked can be a major factor in the quality of a development. Vehicles should not be allowed to dominate the space or inconvenience pedestrians and cyclists. At the same time, the needs of disabled people to park near their dwellings should be acknowledged.</i></p> <p>WA Note: We feel that emphasising the positive and inclusive is more powerful: Pedestrians and Cyclists will be considered first and with this principle in mind, the vehicular need will be properly assessed, well designed and appropriately accommodated.</p>		<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>
<p><i>A balance needs to be struck between the expectations of car owners, in particular the desire to park as near to houses as possible, to be secure and overlooked and the need to maintain the character of the development.</i></p> <p>WA Note: Agreed — see the WA response to 4.2.4 above. However, we add, the character of a development will mean</p>		<p>Comments noted.</p>

	<p>nothing if those who buy the homes, bring more vehicles than will fit in the number of parking spaces, which have been provided by the developer. The plan should be to accommodate the number of vehicles incoming owners are most likely to bring and which they have every right to own and use, and park...near their own homes. (Unless specifically forbidden as part of a contract they have freely entered in to.)</p>	
	<p><i>4.2.6. Technical Advice Note 18: Transport (March 2007) - provides guidance on achieving a sustainable and integrated land use planning and transport system. Paragraph 4.1 states: Car parking can take up large amounts of space in developments, which decreases density and therefore can represent an inefficient use of land.</i></p> <p>WA Note: Well actually, no. Density should be part of a holistic planning and provision approach to what prospective purchasers want. It is very inefficient and ineffective to provide fewer parking spaces than will actually be required...it is also not Socially Sustainable, as is required by Planning Policy.</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>
	<p><i>It can also generate considerable additional trips if located in an area without public transport. Poor design and layout of car parking can also make it more difficult to provide effective, walking, cycling and public transport links.</i></p> <p>WA Note: With regard to 'no public transport'...this is to do with a strategic consideration of land use, but it is also to do with the impact of the reducing number of buses available and reducing frequency. With regard to trains, perhaps Beeching as a Government Planner, was a little bit wrong after all. (Where is inspired long term strategic vision when you need it?!)</p> <p>WA Note: A key component is the way in which people wish to be personally effective and make choices in their own individual lives. This includes how they chose to use their capital; buying and running a car is no small decision and has significant cost attached; millions make the decision to have a private car because it allows them to efficiently mobilise within their environment, and to exercise their right to freedom of choice. They may be contributing to a more sustainable future by using them less, walking, bussing,</p>	<p>Comments noted.</p>

	<p>training more...but they still have a car.</p> <p><i>4.2.7. The TAN makes it clear that maximum rather than minimum parking standards should be adopted. Paragraph 4.7 states: "In determining maximum car parking standards for new development, regard should be given to:</i></p> <ul style="list-style-type: none"> • <i>Public transport accessibility and opportunities or proposals for enhancement;</i> • <i>Targets and opportunities for walking and cycling;</i> • <i>Objectives for economic development including tourism;</i> • <i>The availability in the general area of safe public on-and off-street parking provision; and at different times of the day or week</i> <p>WA Note: Elsewhere we have questioned the usefulness of Maximum and Minimum as terms, there is much unhelpful confusion in their use and interpretation. In the past, there may have been some merit in wanting to prise planners away from wanting oodles of parking spaces per individual dwelling on a development, but this Max and Mm phase has now passed, the phrase is now inadequate and being used inappropriately. As an ethos or description, you should give them their just deserts and scrap Maximum and Minimum, in application it is as robust as a jelly car parking space and clear as a blancmange bicycle. The Developer should identify the realistic car parking space requirements, based on the number of dwellings and intended occupancy. This should be tested, based on the prevailing current car ownership in similar or adjacent residential areas, and also compared to vehicle ownership in similar types of development. (See our evidence on URC Vs Romilly Quarter, which is a sensible, pragmatic and valid approach). For the long strategic view, what trend in ownership is occurring, when might this actually impact on this physical landscape and when? In the meantime, as the Policy clearly states, people will want to park their cars, in line of sight, near their homes. Unless a developer can show robust and believable evidence to the contrary; which will need to be robustly tested by Planning, and to the satisfaction of interested parties; from our experience in our neighbourhood, where existing use shows there is no capacity at peak residential use times, he will</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>
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	<p>need to provide parking spaces at the rate of just under or about 2 vehicles per dwelling.</p>	
	<p><i>4.2.8. Paragraph 4.13 states: Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on- Street control regimes.</i></p> <p>WA Note: It would be interesting to have some scenario laid out which fleshed this out as a concept. We go back to the principle that it is the Developer who is deciding to develop. It is therefore the developer who should carry the responsibility and cost for making his own provision for parking spaces, sufficient to meet the parking needs of those he wishes to attract to buy the dwellings he is developing. If he doesn't then the only conclusion is that 'the public' i.e. the residents 'next door' who are not benefiting from the development, and do not own a property on the development are nevertheless being expected to accommodate the parking arising from the development, in front of their existing homes. In many cases this will not be sustainable because of the density of existing need and residential parking; this is a breach of this policy.</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>
	<p><i>Maximum parking standards should not be applied so rigidly that they become minimum standards.</i></p> <p>WA Note: We don't understand, if they were applied a little bit rigidly, would that do?! The concept of Maximum standards is unmeasurable and 'you cannot measure that which you cannot count'...i.e. when the demand is treated as if it is unquantifiable...unless filtered through the redundant hapless planning algorithm, then the answer will always be what Planning and the Developer want it to be...or have decide it should be...but it will still be biased and wrong.</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>
	<p><i>Maximum standards should allow developers the discretion to reduce parking levels.</i></p> <p>WA Note: Allow discretion? Definitely not. This is a wrong-headed 'coach and horses' clause, because it allows developers to ride roughshod through social sustainability, and in so doing, to provide no parking spaces despite the certainty that purchasers of the dwellings they develop, will bring cars and want to park them. Parking Standards should allow developers to propose the number</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>

	<p>of parking spaces they wish to provide, i.e. that they will physically provide within their development, this must be the parking level which they think will realistically meet the demand arising from the development they are proposing, be it new build or re-purposing old buildings — and this must be fairly and robustly tested to the satisfaction of those affected by the development e.g. including those living nearby. For some small private householder type developments, where there is sufficient slack in a particular location, we understand this may be desirable and potentially allowable — but for any larger undertaking, say two dwellings or more the proof of parking demand should be required of the developer. (The current model for sponsored by the developer, car parking surveys is not fit for purpose) We calculated that the increase in parking space created during the increased kerbside parking provision and pedestrian safety work in the High Street and Broad Street area cost above £20,000 per parking space. We recommend that where a developer wishes to suggest fewer parking spaces are required, that the calculated need without reduction be applied, and that they pay into a holding fund at the rate of 50% of the above or £10,000 per parking space they do not want to provide...with an accurate review over a two year period after the last dwelling is sold and occupied, and that the parking spaces it is shown were not needed, attract a refund of a proportion of the total. For instance, in the case of the URC this would have been a holding sum of £700,000 because he proposed to provide no parking spaces whatsoever; a stark contrast to the s160 payment levied by the Planning Department of under £16,000. The created fund hypothecated could have helped build a parking deck on the Railway car-park for instance, doubling parking capacity for this site.</p>	
	<p><i>However, a particular concern with reduced on-site parking is the potential for problems associated with 'over-spill' parking.</i> WA Note:... 'a particular concern' ...puts it far too mildly. In the URC case, based on our evidence accepted at Planning Committee, about 40 spaces were required for residential parking and visitors — the intended residents were held to be work-live, therefore</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>

	<p>would be there 'all the time' or at least for large tracts of the day; when you combine this with the intention to have 100 plus staff in the offices for the solicitor's business, which will produce the need to park between 20 to 30 vehicles, probably more...conservatively between 60-70 vehicles in all...with NO parking whatsoever. This is not 'overspill' it is massive over-kill. However, the current culture and patterns of behaviour in the Vale Planning Department saw this particular and real concern expressed by the local residents, as invisible and having no merit. As much as anything else in this paper, this alone demonstrates the staggering inadequacies of the current Planning system and process, as we see presently being practiced in the Vale, from experience.</p>	
	<p><i>Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the Impact of new development.</i></p> <p>WA Note: Hear, Hear! Note LA when developing strategy. We did the hard yards and provided the evidence...but found no engagement in assessment, no answers to what we judged is the reality on the ground, no proper dialogue, no demonstration of why our objective research was flawed etc., etc., etc. It is no good saying one thing and doing another. Understandably, our trust in the fairness of the system fairly flew out the window.</p>	<p>Comments noted. This comment refers to a previous planning application at the United Reformed Church, Barry which was approved at appeal. This does not relate to the contents of the draft SPG and therefore no further response is considered necessary.</p> <p>No change required.</p>
	<p><i>Where on Street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of on-street parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.</i></p> <p>WA note: We hark back to our example of the URC proposal because it speaks to this point eloquently. And on Bonfire night, regarding the road outside the URC, - page 11 of the Vale of Glamorgan Cabinet minutes 5th November 2018 says: "The area in general was very heavily parked, a situation which was likely to worsen when the existing church building located on the south-western corner of the junction was converted into 22 residential homes of 1, 2, 3 and 4 bed residences and office premises for up to</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy. The majority of this comment refers to a previous planning application at the United Reformed Church, Barry which was approved at appeal. This does not relate to the contents of the draft SPG and therefore no further response is considered necessary.</p> <p>No change required.</p>

160 office workers, with no off road parking facilities” WA Note: As we say in our accompanying letter to Rob Thomas: How can it all of a sudden worsen now...but despite what we told you, the free objective evidence we provided you with, you couldn't see it would worsen, then? Since your refusal of the application for the Nursery at 28 Windsor Road, how did it get sufficiently better for Planning to recommend approval of the URC, a refusal by the way which you based on: ‘...commercial use in a primarily residential area where the significant traffic generation, vehicle movements and on-street parking would have an unacceptable impact on the amenity and character of the residential area and would be detrimental to highway safety’ All things which apply even more so to the URC corner. — and of course, the truth is it didn't get better, it has inexorably got worse — as our research-based evidence and your own minute shows. WA Note: We add, how come this is the official picture now, which is exactly what we've been saying for three years...yet it is very different to the very strange so-called parking surveys, used as evidence to support the ‘what problem?’ stance of the Developer/Planning? It would be a good start in improving our communications and relationship with the Council for this to be explained to us. Additionally, In the minutes, also referring to the same area: ...comments regarding making junction “safer” cannot be implemented due to cost: “11. In addition the Council is currently considering a scheme proposal for a reconfiguration of the junction with associated crossing facilities which will reduce vehicle approach speeds and improve the operation of the junction. Unfortunately, the necessary funding for implementation of this scheme is currently not available.” (extract from Cabinet paper 05/11/2018) WA Note: But according to the paragraph from the draft policy near the top of page 38, the developer should have been made to make the funding available. The question is: Why wasn't the developer made to pay as part of his s106 payment, towards something which will massively worsen in our neighbourhood, i.e. as a direct result of the impact arising from their development? WA Note: It was clear to Highways, to South Wales Police, to Local

	<p>Business Leaders, to Romilly School Governors, to local Ward Councillors, to the Assembly Member, to over 300 households in the WRAP Around area that despite:</p> <ul style="list-style-type: none"> • No more parking spaces are created in a finite streetscape by introducing ‘controlled parking’ • The evidence of saturation in parking demand • The previous refusal of a proposal for a Nursery at 28 Windsor Road which actually quoted ‘unacceptable road safety and congestion issues, and lack of parking’ (Highways) • The unanimous concerns of the Planning Committee, despite the irrational and illogical recommendation to accept from Planning officers That the system and procedures ‘allowed’ planning officers to recommend approval...they have never explained why. WA Note: This clause alone and the way in which those with responsibilities for carrying out the process part of the Planning system, is evidence of a process and a set of behaviours which cannot be defended, are unsustainable and need serious revision. WA Note: More than this, when experience deviates from the intended path so dramatically, it is difficult to conclude other than there is a toxic ‘against the intent of the policy’ agenda in play. 	
	<p><i>4.2.9. Paragraph 4.15 of the TAN in relation to residential car parking states some car free housing development may be appropriate in locations with good walking, cycling and public transport links and in areas where parking is controlled. Onsite cycle and parking provision for those with disabilities will be required if such on-street parking cannot be provided. Planning obligations will have a role to play in ensuring residents do not own cars in such developments.</i></p> <p>WA note: We would like to have it explained to us why the URC, where no parking is being provided, and which therefore has all the hallmarks of the type of development covered by this clause i.e.:</p> <ol style="list-style-type: none"> 1. On-street parking cannot be provided in anywhere near the number of parking spaces that the development will demand. 2. Other than in an area of Windsor Road, on street parking is not controlled 	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy. The majority of this comment refers to a previous planning application at the United Reformed Church, Barry which was approved at appeal. This does not relate to the contents of the draft SPG and therefore no further response is considered necessary.</p> <p>No change required.</p>

	<p>3. No plans have been put in place for parking for those with disabilities. Yet the paragraph goes on to say that ‘Planning obligations will have a role to play in ensuring residents do not own cars...? WA Note: Noting that the developer said I cannot stop them having cars’...in the light of the similarities of the URC position to 4.2.9 and the un-deliverable nature of the parking demand from the development, we would welcome Planning and the Developer deciding to make this a condition for both residential and business use</p>	
	<p><i>In such cases, it is essential that, prior to occupation, the future residents should be made aware of the car free status of the development and the use of travel planning initiatives should be encouraged. 4.2.10. Paragraph 4.16 states: Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.</i></p> <p>WA note: ...should give greater weight...? What does this mean in practice? In a decision-making tree, when coupled with 4.2.8 para 4.3: Our reading of this clause should have ‘forced’ the planning officers to recommend refusal — why did it not? No transparency is equivalent to secrecy, but secret for what reason — we genuinely would like to know. This is a crucial point. If the system is to be transparent as it is claimed it wishes to be, it needs to be wholesome and trusted, fair-minded and open.</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy. The majority of this comment refers to a previous planning application at the United Reformed Church, Barry which was approved at appeal. This does not relate to the contents of the draft SPG and therefore no further response is considered necessary.</p> <p>No change required.</p>
	<p><i>4.2.11. Paragraph 5.13 states: The location of both on- and off-street car parking spaces will be critical to the design quality of streets. Where on-street car parking is not controlled planning authorities should recognise that residents will seek to park as close to their homes as possible and should ensure the street layout mitigates against inappropriate parking and avoids the obstruction of pedestrians or emergency access.</i></p> <p>WA Note: We do not understand this one. Surely in a densely populated residential area — with or without ‘controlled’ parking...residents will always seek to park as close to their homes</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>

	<p>as possible. Other parts of this policy indicate that this is desirable as their mobile property (their car) should be visible from their fixed property (their home)? Strategy should enable what has been declared as desirable. It follows that policy and enactment of it through process and decision making, should enable people to park as near to their home as possible.</p>	
	<p><i>The following key principles need to be followed when considering the design and location of car parking:</i></p> <ul style="list-style-type: none"> • <i>The important role of the Street in creating a liveable neighbourhood;</i> <p>WA note: Ain't that the truth... how strongly has this been adhered to, in allowing the URC to blight our neighbourhood?</p>	<p>Comments noted. The majority of this comment refers to a previous planning application at the United Reformed Church, Barry which was approved at appeal. This does not relate to the contents of the draft SPG and therefore no further response is considered necessary.</p> <p>No change required.</p>
	<ul style="list-style-type: none"> • <i>There is no single best solution; a combination of on plot, off-plot and on-street will often be appropriate;</i> <p>WA Note: We agree - where there is sufficient capacity, a mix is fine, where there is not, the onus must be on the developer to provide parking either onsite or in a dedicated facility nearby, to avoid the detriment to existing residents...or alter the plans, or do not develop.</p>	<p>Comments noted.</p>
	<ul style="list-style-type: none"> • <i>The street can provide a very good car park. On-street parking is efficient, understandable and can increase vitality and reduce speeds;</i> • <i>Parking in the back of a block is recommended only after the provision of parking at the front and on street has been fully considered. Rear courtyards need to support on-street parking, not replace it; and</i> • <i>Car parking needs to be designed with security in mind. Advice on this issue is contained in 'Safer Places'. Manual for Streets (MfS) (2007) recognises that parking is a key function of many streets, although it is not always a requirement.</i> <p>WA Note: It is in most streets in Barry.</p>	<p>Comments noted. The draft SPG refers to a best practice guidance document Manual for Streets which is promoted by PPW. Therefore the draft SPG needs to take account of this document to ensure it can be used as a material consideration in planning decisions.</p> <p>No change required.</p>
	<p><i>A well-designed arrangement of on-street parking provides convenient access to frontages and can add to the vitality of a street. Conversely, poorly designed parking can create safety problems and reduce the visual quality of a street. Chapter 8 considers the parking requirements associated with new</i></p>	<p>Comments noted. The draft SPG acknowledges there is a high demand for parking provision, however, this does not mean that parking needs to be provided in line with that demand. The draft SPG seeks to promote a modal shift from the private car to more sustainable forms of travel by implementing maximum parking standards which allow lower</p>

	<p><i>development and advises that while the greatest demand is for parking cars, there is also a need to consider the parking of cycles, motorcycles and in some instances service vehicles.</i></p> <p>WA Note: - and there you have it. After all the understandable better quality of life advice about cycling, using buses and trains, walking etc — it comes down to an acknowledgement that ...the greatest demand is for parking cars.</p>	<p>provision where it can be proven through appropriate and robust evidence to be suitable within the local context.</p> <p>No change required.</p>
	<p><i>4.2.13. It provides advice on safety and security of car parking: cars are less prone to damage or theft if parked in-curtilage. If cars cannot be parked in-curtilage, they should ideally be parked on the street in view of the home.</i></p> <p>WA Note: We would probably, had we read this much earlier, have put this at the core of the case regarding social sustainability — why would any policy, interpretation of policy or decision in planning, want to do anything other than seek to work to such an ideal? This naturally leads to not only a notional allocation but also one at an ‘in sight’ location...near the home-owner. Following this through logically, people having cars, wanting to park near their homes, wanting this to be in line of sight from their front window — establishes the case we have been putting forward all along; these factors establish the principle of notional allocation, if there is no space at high use residential times...there is no space to notionally allocate to new proposals. You cannot allocate a space more than once...this natural progression and obvious outcome does not feature in the dodgy algorithm.</p>	<p>Comments noted. The draft SPG supports well designed parking provision, however, it still needs to comply with national policy contained within PPW which promotes maximum parking standards and where appropriate lower levels of parking.</p> <p>No change required.</p>
	<p><i>Where parking courts are used, they should be small and have natural surveillance. 4.2.14. Paragraph 8.3,5 states: Local planning authorities will need to consider carefully what is an appropriate level of car parking provision.</i></p> <p>WA Note: Ah yes, appropriate...to meet the realistic needs, or perhaps a different appropriation of appropriate? We have proved that the algorithm does not produce the answer to ‘how many parking spaces will this development need in practice?’</p>	<p>Comments noted. The draft SPG outlines that appropriate and robust evidence will be required to demonstrate lower parking provision for a development proposal based upon the sustainability of the area and its local context.</p> <p>No change required.</p>
	<p><i>In particular, under-provision may be unattractive to some potential occupiers and could, over time, result in the conversion of front gardens to parking areas (see box).</i></p>	<p>Comments noted.</p>

	<p>WA Note You'd have a hell of a job converting WRAP Around area front gardens into parking areas...and if you did, there goes another section of kerbside for on-street parking; but with regard to under-provision...this already exists, the job has already been done by successive Planning decisions.... before the URC proposal was a speck in anyone's eye.</p>	
	<p><i>This can cause significant loss of visual quality and increase rainwater run-off, which works against the need to combat climate change.</i></p> <p>WA Note: Agreed.</p>	<p>Comments noted.</p>
	<p><i>Policy MD2 - Design of New Development - sets out the key principles that should be considered in respect of design, amenity and access. It requires development proposals to provide safe and accessible environments for all users, giving priority to pedestrians, cyclists and public transport users and provide car parking in accordance with the Council's standards. This SPG sets out those standards.</i></p> <p>WA Note: Again — amenity, parking spaces for existing residents is identified as one of these, key word in this policy is 'provide' which is the opposite of 'not provide'.</p>	<p>Comments noted.</p>
	<p><i>Policy MD4 - Community Infrastructure and Planning Obligations - seeks to secure new and improved community facilities and services appropriate to the scale, type and location of proposed new developments including transport infrastructure and services for pedestrians, cyclists, public transport and vehicular traffic.</i></p> <p><i>Policy MD5 — Development Within Settlement Boundaries — sets criteria for these developments, stating that proposals will be permitted where (amongst other things) they have no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking.</i></p> <p>WA Note: It would be better to be clear and avoid doubt: '... they will not be permitted where they have an unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking.' The URC proposal should not have been permitted if it had been objectively tested against this policy. Key here is how this is assessed and how will we know it. We have here</p>	<p>Comments noted. The draft SPG cannot change policies within the LDP but rather expand upon them and give further detail on certain points. The proposed change would go beyond the existing policy wording within the LDP therefore; the SPG would not be in accordance with local planning policy and could not be viewed as a material consideration in planning decisions.</p> <p>No change required.</p>

	<p>a fundamental transparency and trust issue. The challenge is also, if the Planning Officers have got it wrong, but still recommend approval — where is the safety mechanism step in the process, and who at a higher level within the Council is doing the overview and scrutiny before this becomes set in stone. Against this criteria alone, a decent decision-making tree, able to be viewed in the public domain, would never have allowed the URC</p>	
	<p><i>4.3.3. It should be noted that the policies detailed above comprise the primary policies of the Vale of Glamorgan LOP relating to sustainable transport, parking and movements however other policies of the plan may also have a bearing on such matters and be utilised in the Council’s determination of future planning applications. 4.3.4. The Local Transport Plan 2015—2030 (LTP) - The LTP sets the transport agenda for the Vale of Glamorgan, by identifying the sustainable transport measures required for the period 2015 to 2020 as well as looking forward to 2030. The LTP seeks ways to secure better conditions for pedestrians, cyclists and public transport users and to encourage a change in travel choices away from the single occupancy car.</i></p> <p>WA Note: No problem with encouraging choices away from single occupancy car, as long as it is choices NOT coercion</p>	<p>Comments noted.</p>
	<p><i>The LTP also seeks to tackle traffic congestion by Parking Standards SPG — Draft for Consultation (December 2018) securing improvements to the strategic highway corridors for commuters who may need to travel by car as well as providing better infrastructure for freight. It also addresses the key road safety priorities for the Vale. 4.3.5. National and local policy has therefore seen a fundamental departure from predicting and providing for private cars and a move towards managing traffic and reducing the dependency on the private vehicles.</i></p> <p>WA Note: We have no argument regarding what national policy wants to set as the direction of travel, we anticipate that reducing dependency on private vehicles is fine, as long as the reduction is a result of the choices people freely make. If people are able to do all they wish to do by using more attractive & improved ‘other modes’ of transport — fine, but it is clear there is much to do to</p>	<p>Comments noted. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy.</p> <p>No change required.</p>

	<p>ensure this is in place...and even then, it has to be their free choice.</p> <p>Nationally, bus journeys are falling, train fare costs are escalating, and outside major conurbations — many journeys simply cannot be undertaken on public transport. Cardiff bus is cutting services and there are no additional services or increase in carriage sizes or numbers of carriages making up the trains, despite the model shift argument deployed by Planning. And although these trends are travelling in the wrong direction currently, even if these improvements happen, sometime in the future, this local policy accepts that individuals wish to have the freedom to have a private vehicle and to park it near their home. Unless people sign up to not having cars...when they move in, they will bring cars, as the URC developer said ‘I cannot stop them having cars’.</p>	
	<p><i>Supplementary Planning Guidance</i></p> <p><i>4.4.1. Planning Obligations SPG — The Planning Obligations SPG, provides clarification of where, what, when and how planning obligations will be sought, in order to assist the Council in creating sustainable communities that provide social, economic, and environmental benefits. This guidance offers advice on planning obligations in support of the policies in the Vale of Glamorgan LOP, including planning obligation requirements for sustainable transport facilities that will assist in delivering successful Travel Plans that can influence parking demand.</i></p> <p>WA Note: ‘Travel Plans’ only possibly influence parking demand where people are travelling to...the places served by the travel plans. One of our working group members had 19 jobs in their career, the last 14 of which required him to be independently mobile and have his own car. For the whole of the period covered by the 19 jobs...he had a car.</p>	<p>Comments noted. Please see response above to travel plans. More information regarding the contents of travel plans can be found in the Council’s Travel Plan SPG (2018).</p>
	<p><i>4.4.2. Travel Plan SPG — This SPG sets out the Council’s requirements for Travel Plans in order to reduce the reliance on the private car and encourage a move to more sustainable modes of transport.</i></p> <p>WA Note: See above</p>	<p>Comments noted. See above response regarding travel plans.</p>
	<p><i>4.4.3. Residential and Householder Development SPG — This SPG</i></p>	<p>Comments noted. See above response regarding the use of maximum</p>

	<p><i>provides advice on what matters must be considered when designing new residential development or improvements or alterations to your home, preparing plans and submitting planning applications. The SPG provides guidance on the main issues arising from new householder development; provides a number of standards that should be complied with in order to safeguard residential amenity; sets out a series of principles to be followed to ensure good design; and provides possible solutions to certain design issues encountered. Application of Parking Standards for the Vale of Glamorgan 5.1. In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as maximum rather than minimum standards i.e. they are 'not more than' figures. Car parking provision is a major influence on the choice of means of transport and the pattern of development. We need to ensure that new developments provide lower levels of parking than have generally been achieved in the past and minimum parking standards are no longer appropriate (PPW paragraph 8.4.2 refers).</i></p> <p>WA Note: See our notes earlier on the Max-Mm Park-o-meter confusion.</p>	<p>parking standards.</p>
	<p><i>5.2. It is considered that using maximum standards which limit the amount of parking provided on developments can help focus attention on the overall travel context of a development including the availability of more sustainable modes of transport such as public transport, walking or cycling. Such an approach will enable more flexibility to the application of the parking standards (where supported by appropriate and robust evidence) to reflect local conditions and the availability of alternative forms of transport and may result in a reduction in the level of vehicle parking required.</i></p> <p>WA Note: This is fundamental. The key words in this paragraph are: Help focus attention...enable more flexibility in the application of parking standards (where supported by appropriate and robust evidence) ...to reflect the local conditions and ... may result in a reduction of the level of parking required. The reason they are key is emphasised by the last word 'required'. The meaning of required in this context is:</p>	<p>Comments noted. Paragraph 5.2 of the draft SPG sets out how parking provision will be assessed in line with national guidance which promotes the use of maximum parking standards with a view to reduce reliance on private car ownership. The draft SPG cannot change the contents of national planning policy guidance. However, the draft SPG must be written in accordance with both national and local planning policy. Some of this comment refers to a previous planning application at the United Reformed Church, Barry which was approved at appeal. This does not relate to the contents of the draft SPG and therefore no further response is considered necessary.</p> <p>No change required.</p>

	<ul style="list-style-type: none"> • the number of parking spaces required and necessary to enable the development to work and in almost all cases, consume its own parking needs smoke. • required in terms of being sufficient for the needs of the new and incoming residents, • required in order to preserve and protect the amenities currently enjoyed by adjacent or nearby residents • required in the context of the competing pressures for parking • required because of the successive planning allowed hereto with insufficient (not none) parking and this having already taken up any slack • required because the developer can demonstrate the demand will be for fewer parking spaces than may have been envisaged in the past: and crucially can prove this to be the case, and is held to that proof in practice...and pays for it if he is wrong • required to be appropriate and robust evidence...because dodgy parking surveys do not demonstrate residential need, temporally unused allocation etc. and in the case of URC where they fantasised about 24 parking spaces which were just not there! The current method of viewing the poacher as also the gamekeeper, i.e. the developer arranges the surveys, we have proved is fundamentally broken and bad governance 	
	<p><i>5.3 In assessing the parking requirements for a particular development, the Council will take into account a number of factors in relation to the development and its location. These could include:</i></p> <ul style="list-style-type: none"> • <i>Accessibility to and the service provided by public transport;</i> • <i>The availability of private buses, taxi services or the extent of car-pooling;</i> • <i>The relative proportions of full time/part time/local catchment of labour;</i> • <i>Accessibility by walking and cycling to every day goods and services;</i> • <i>The existing and possible future parking provision, traffic volumes and congestion on streets adjacent to the development;</i> • <i>Potential impacts on highway/public safety;</i> 	<p>The draft SPG sets out how planning officers will assess parking provision in regards to parking standards in light of national and local planning policy. PPW states “It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking; cycling and public transport ahead of the private motor vehicles.” (PPW, para.4.1.11, 2018). Therefore, decision makers must consider parking provision in light of the sustainable transport hierarchy and the objective of reducing reliance on the private car. The approach promoted in the draft SPG is considered to appropriately reflect national planning policy. The draft SPG does require developers to submit appropriate and robust evidence to support applications which propose lower parking provision than the maximum standard.</p>

	<ul style="list-style-type: none"> • <i>Accessibility to and the availability of public and/or private car parking spaces in the vicinity.</i> <p>WA Note: The first four cannot be used as material to having a bearing on the actual demand for parking spaces that will in practice arise from any given development, unless there is robust evidence to show they actually will and have had a bearing. We asked to see a similar set of data from Planning in a FOI request, in order to tease out norms, impact from decisions etc., in other words the learning from experience; they refused to provide it. Question: What evaluation of developments are done post decision to approve, to test if the assumptions made at the time of recommending approval were close, far off or horrendously incorrect? Please tell us where is the Learning? From here, and from experience, we see no appetite for it.</p>	<p>In regards to an evaluation of developments, a travel plan can be implemented by condition, where it is considered necessary by the local planning authority, which can be used to monitor objectives of the travel plan. For further detail please see the response above relating to travel plans and the Council’s adopted Travel Plan SPG (2018).</p> <p>No change required.</p>
	<p><i>5.4. The parking standards cover all areas in the Vale of Glamorgan but apply to designated zones (as set out in Section 6 below). Whilst they should not be applied as minimum standards (following the advice in PPW) they suggest the starting point for considering the necessary level of parking to serve new developments. If satisfied these developments are unlikely to cause highway safety problems associated with inconsiderate parking or contribute towards issues such as congestion. Where they are not met, consideration will need to be given to whether it is justified in light of other considerations (see paragraph 5.3 above) and whether there are likely to be problems associated with a lack of designated parking spaces in the vicinity of the development for existing communities and the future users of the development. Where these problems Parking Standards SPG — Draft for Consultation (December 2018) would occur from a lack of adequate parking, planning permission may be refused as the development would be contrary to LDP Policy MD2.</i></p> <p>WA Note: Well, from our experience with the URC, it was very clear there will be problems associated with 22 dwellings and offices accommodating over 100 people while providing no parking whatsoever, therefore 5.4 is a useless piece of fluffy nonsense. If satisfied unlikely...what, really?! Who satisfied, why</p>	<p>Comments noted. The representation makes reference to a planning application which has been approved at appeal and the current consultation relates to the draft SPG. Therefore no further response is considered necessary.</p> <p>No change required.</p>

	<p>unlikely, how judged, what evidence...in application to date, this is just silly waffle mumbling and bonkers.</p>	
	<p><i>5.5. Whilst there is a desire to reduce the reliance upon the private car, it is anticipated that, in most cases, there will be a need to accommodate parking provision for cars within residential developments.</i></p> <p>WA Note: Within...so where was this clause and why did it not feature, when URC was being decided?</p>	<p>The draft SPG accepts that it is likely residential developments will require parking. However, the amount of provision will be determined on a case by case basis, based upon appropriate and robust evidence and the local context. In relation to the United Reformed Church, Barry the decision regarding this development has already been made following an appeal. It is not the place of the draft SPG or this consultation to comment on the decision of that appeal.</p> <p>No change required.</p>
	<p><i>There is the potential for a reduction in residential parking levels particularly if the property is in close proximity to local community facilities, public car parks, is well served by public transport and/or there is evidence of low car ownership.</i></p> <p>WA Note: We provided evidence of car ownership, which was over twice the algorithm derived nonsense.</p>	<p>The representation makes reference to an application which has already been decided upon. The draft SPG clearly outlines that appropriate and robust evidence will be required to support any reduction in parking provision and be considered within the planning application process.</p> <p>No change required.</p>
	<p><i>Care should be taken however to avoid reductions that will potentially create highway safety issues and consideration must be given to local circumstances e.g. road widths, local on street parking demand, proximity to turning heads or bus stops etc. These matters need to be considered on a case by case basis.</i></p> <p>WA Note: Considered by whom, in which way with what evidence, what weighing up protocol, how reviewed, how shared how understood and how accepted??? We need to know, in order to inform suggested improvements in the written step by step process for doing this - and it therefore needs to be publicly available.</p>	<p>Comments noted. The draft SPG is written to inform developers, applicants and the public on parking standards within the Vale of Glamorgan. Therefore, it is them who should consider the local circumstances and the impact this could have on a proposal as this should inform the design of the development. It is then up to the local planning authority to consider whether a proposal has fully considered all the matters on a case by case basis in line with the draft SPG which can be used as a material consideration in planning decisions.</p>
	<p><i>There may be some instances where reduced or zero parking is acceptable, for instance, where developments are in highly accessible locations served by a range of public transport options and/or it can be demonstrated that there is low parking demand.</i></p> <p>WA Note: Residents need proof that a low parking actual demand has been demonstrated. (Not the discredited algorithm)</p>	<p>The draft SPG states that a proposal which includes zero parking would need to be supported by robust evidence which fully justifies why zero provision would be acceptable.</p> <p>No change required.</p>
	<p><i>However, these proposals would need to be supported by robust evidence which fully justifies why a reduced or zero level of</i></p>	<p>Cllr Ian Johnson made a similar comment regarding the use of fall back positions (please see response to Cllr Johnson above for more detail).</p>

<p><i>provision would be acceptable. Such evidence could include but is not restricted to local parking surveys, comparative assessments with existing / previous uses, likely car ownership evidence for future occupiers, travel plan strategies etc. 5.7. Where a car parking survey is required it should establish the existing parking demand within the local area of a proposed development using on-site assessments / observations. In order to obtain a true reflection of the existing local car parking arrangements, site surveys should be undertaken over a period of at least one week including both weekends and weekdays at a variety of times throughout the day relevant to the nature of the use proposed including peak times, late in the evening and early in the morning. Times where unusually high or low parking demand is being experienced which is outside the norm (e.g. School holidays, bank holidays or special events) should be avoided. 5.8. It will often be relevant to take into account the existing or previous use (or uses that could result from a 'permitted' change of use) and the parking requirements associated with it, together with an analysis of the actual provision for that use.</i></p> <p>WA Note: It is not relevant when existing or previous use is compared to actual provision for that use, this is particularly so when Planning decisions in the intervening period have eliminated 'the actual provision' for that use. This is why taking notice of fall-back was inappropriate and unfair in the case of the URC, because it was applied as if the capacity on the roads was still the same — when the Council and the Developer knew it not to be so. We refer you again to the Cabinet minute on the 5th Nov 2018 which independently demonstrates that the Council knows this not to be so. This is why we have always challenged the idea of previous use or fall-back.</p>	<p>Therefore the following has been included within the draft SPG at paragraph 5.8:</p> <p><u>“However, if sites have been vacant or uses abandoned this ‘fall-back’ position will have limited weight in assessing parking demand for new development.</u></p>
<p><i>If the parking serving the existing use is already lower than the parking standards, this can be a material consideration justifying a reduced level of parking where there is no additional detriment compared to the existing situation.</i></p> <p>WA Note: If the change in use significantly increases the use over the previous use, then there is additional detriment compared to</p>	<p>Comments noted. Please see response above and proposed amendment to the draft SPG.</p>

	<p>the existing situation. Fall-back or previous use should be held not to apply. Any developer working collaboratively with local residents can identify current actual use of parking for the existing or previous use. We did this and were happy to share our evidence with both Planning and the Developer and we did so — Planning did not encourage a change of heart and the Developer was unwilling to respond to our evidence and offer a compromise. We felt this was a fair test of the good neighbour intentions of a developer...and the existing residents. There is a fundamental aspect in judging what people (developers) say they want to do. They are responsible for choosing to do what they want to submit as a proposal. If they wish to massively increase the parking needs because of their chosen change of use, it is for them to provide the on-site parking to go with their proposal, where the existing residential roads have been shown to be saturated — otherwise, don't develop...it is really as simple as that.</p>	
	<p><i>5.9. New residential layout design, as advocated by Manual for Streets, can create areas of unallocated parking which can supplement those areas of allocated off-street provision i.e. driveways, garages.</i></p> <p>WA Note: True it can. Unfortunately, in already built up densely populated residential neighbourhoods there are limited and dwindling amounts of 'unallocated' provision. We question the idea of unallocated. As a description to cover kerbside which is not a driveway, garage etc it is fine. But, let us imagine a scenario where there are 10 dwellings with 102 metres for their frontages and with no off-road parking available to them. In Rip-car Winkle close they own cars at the rate of our community average of 1.7 vehicles each. (1.7carsx6mx10dwellings=102 metres) Policy acknowledges they will want to park as close to their home as possible Policy says it is desirable for their vehicle to be in line of sight from their home...therefore policy accepts that the available parking in this residential road is all taken up. The oft used 'you have no legal right to expect to park outside your home' i.e. on the public road...is understood - and all these neighbours are flexible.</p>	<p>Comments noted. Please see above responses in relation to following best practice guidance supported by national planning policy.</p> <p>No change required.</p>
	<p><i>A parking requirement for a particular property can count both off-</i></p>	<p>Comments noted.</p>

	<p><i>street allocated space and unallocated on-street space provided there is a realistic chance the latter will be used and its use will not create obstruction or congestion for other road users.</i></p> <p>WA Note: We agree with this, sadly URC did not fall into this description, or anywhere near.</p>	
	<p><i>For the purpose of this document, a standard parking space is considered to be 2.6 m x 4.8 m however, sufficient space must be available around this area to enable safe and...</i></p> <p>WA note: i.e. 6m when looking at kerbside provision</p>	<p>Comments noted. A case by case approach is promoted to allow decision makers to assess, based upon the local context, what would qualify as sufficient space to enable safe and convenient access to vehicles. Furthermore, this section relates to designated parking spaces where decision makers have more control to ensure parking spaces meet the standard size, unlike unallocated kerbside parking provision where decision makers have little to no control on how people park. In any case note 3 goes on to state "All parking spaces adjacent to the carriageway or fronting a garage are required to be provided at a length of 6.0m to allow loading and unloading of vehicles or to enable access to the garage" this gives an example of what is considered to be a sufficient length to enable the safe and convenient access to vehicles.</p> <p>No change required.</p>

Renewable Energy SPG

Organisation	Comment Received	Council Response
<p>Llandough Community Council</p>	<p>The views of the Community Council on this consultation are as follows:-</p> <p>a. The Council generally welcomes the thrust to less regulation for small (household) installations. The Council is relaxed about the use of roof mounted panels, with the possible exception of special areas or listed buildings, if they can be seen from the road they 'front'.</p> <p>b. The Council is less certain about small wind turbines but, if this is restricted to something akin to a TV Aerial then the Council would have no objection.</p> <p>c. Free standing larger turbines (windmills) could be an issue to neighbours in a residential estate.</p>	<p>a. Support is welcomed. Conservation areas and listed buildings require more detailed assessment of the potential impact due to the historic nature of the areas/buildings. Further guidance can be accessed from Cadw which has been signposted within the amended SPG under Section 9 - Further Guidance and Information.</p> <p>b. Objection noted. The Council believes the guidance contained within paragraph 5.1.8 of the draft SPG is sufficient to ensure any micro-generation scheme for wind power can be assessed appropriately</p> <p>c. Comments are noted. Freestanding turbines would require greater</p>

	<p>d. Large scale solar farms are a lot less intrusive than say Aberthaw power station and better for the environment. However, there could be issues over distribution cables? The planning guidance talks of mitigating the visual impact and other ecological impacts which appears to be a sensible approach.</p>	<p>scrutiny at is covered under paragraph 5.1.8 of the draft SPG.</p> <p>d. Support is welcomed. In regards to distribution cables, cables on site connecting solar panels to the main grid is covered under section 7.7 Historic Environment where connection routes need to be considered.</p>
<p>Natural Resources Wales</p>	<p><u>Section 7.5- Ecological impact</u> We note that the SPG covers micro generation that may be attached to buildings or sited very close to buildings. We therefore recommend that wording is added that considers the potential presence of bats roosts in buildings as even relatively small scale works for micro wind and solar on buildings may have the potential to affect bats. The following link provides some examples of where impacts could arise, which you may find useful; https://www.bats.org.uk/about-bats/threats-to-bats/wind-farms-and-wind-turbines/microgeneration-schemes</p>	<p>Section 7.5 - Ecological Impact - Council agrees with the comments. However, it is considered more appropriate to add the following amendment to section 5:</p> <p><u>5.1.5. It should be noted that all forms of micro-generation have the potential to have ecological impacts particularly in relation to protected species such as bats. The potential presence of bat roosts in buildings as small scale works can still have the potential to cause adverse ecological impacts. Therefore, developers wishing to install micro-generation technologies will need to consider the presence of bats on site to ensure they comply with the Conservation of Species and Habitats Regulations (2010). The potential impact on bats can arise from either:</u></p> <ul style="list-style-type: none"> • <u>The installation of equipment and materials that passes through a roof void where a bat roost is located within the development. This applies to the installation of any fixtures to the roof or alterations to the roof such as might be required for solar panels; or,</u> • <u>Operationally where there is a risk for bat strike against moving turbine blades where a micro-turbine is in the vicinity of a bat roost or along flight lines. This maybe within the development or nearby.</u> <p><u>5.1.6. Due to the nature of bats the presence of roosts can often be overlooked. Consequently it is advised developers seek the advice of an ecological consultant prior to installing a micro-generation scheme which is likely to impact upon bats.</u></p> <p>A reference to the Bats Conservation Trust website has been included as</p>

	<p><u>Section 7.5.1</u> We recommend that bats are also referred to in this section. For example- ‘However, the operation of the wind turbine can also have ecological impacts such as the disturbance of habitats and aerial animal species such as birds and bats colliding with the turbine blades.’</p> <p><u>Section 7.5.2</u> We recommend that wording is added clarifying that turbines should be sited away from linear features and existing dark corridors such as woodland and hedgerows as these are used by bats for foraging and commuting. For example- ‘In regards to mitigating the impact caused by site infrastructure, buffer protection zones should be used for identified sensitive habitats and species on the application site to allow infrastructure to be situated away from sensitive areas, for example siting turbines away from dark linear features such as hedgerows, that are used by bats for commuting and foraging’</p> <p><u>Section 7.5.4</u> We recommend that more mitigation examples are included here such as wind turbines having to be conditioned to be switched off at certain times of the year or at night during sensitive periods, dependent on proximity to certain types of bat roosts or bird habitat. Section 10.1- Appendix 1: Planning Application Requirements for Renewable Energy Proposals</p>	<p>a footnote.</p> <p>Section 7.5.1. - The Council agrees with the comments, please see following amendment: 7.5.1. Wind energy schemes have specific ecological impacts which can result in the loss of habitat and the disturbance and fragmentation of plant and animal species. However, the operation of the wind turbine can also have ecological impacts such as the disturbance of habitats and aerial animal species such as birds and bats colliding with the turbine blades. Further guidance relating to the impact developments can have upon biodiversity can be found within the Council’s Biodiversity and Development SPG</p> <p>Section 7.5.2. - Council agrees with the comments. Amend paragraph 7.5.2 as follows: 7.5.2. In regards to mitigating the impact caused by site infrastructure, buffer protection zones should be used for identified sensitive habitats and species on the application site to allow infrastructure to be situated away from sensitive areas, <u>for example siting turbines away from dark linear features such as hedgerows, that are used by bats for commuting and foraging.</u> Furthermore, species specific measures can also be taken to minimise the potential ecological impacts. In relation to the turbine blades colliding with animals such as birds and bats, the micro-siting of turbines within a development site away from identified areas of high flight activity will minimise the potential for collisions.</p> <p>Section 7.5.4. - The Council agrees with the comments. Insert new bullet point in paragraph 7.5.4 as follows: 7.5.4. Possible mitigation methods during the operation of development include: • Increasing separation of solar panels</p>
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Section 10.1.1

Ecological survey- we advise that wording is added here confirming that the scope of the survey and assessment need should be agreed with the LPA ecologist.

Air Quality Assessment-

We advise that the following wording should be added to this section;

www.naturalresourceswales.gov.uk

www.cyfoethnaturiolcymru.gov.uk Page 3 of 3

'Where designated nature conservation sites (e.g. SAC and SSSI) are within range to potentially be affected the resulting pollution loadings to the site will need to be assessed and considered.'

Section 10.1.4

This section is factually incorrect, and it confuses Habitats Regulations Assessment (HRA) and non-HRA issues e.g. there is no legal requirement for HRA where a SSSI is not also a SAC. The need or otherwise of other consents such as a marine licence is not only relevant to cases that require HRA. We recommend you review the wording of this section and ensure it is consistent with legislation and case law.

Section 10.1.5

A significant effect for the purposes of HRA is one which may undermine the conservation objectives for any feature of a European site (SAC, Ramsar, SPA). Therefore, there does not have to be an established "detrimental effect" to trigger the legal need

- Including wildlife highways
- **Wind turbines conditioned to be switched off during certain times of the year or at night during sensitive periods, dependent on their proximity to certain types of bat roosts or bird habitat**
- Avoid excessive security lighting.

Section 10.1.4 - The Council agrees with the comments. Amend paragraph 10.1.4 as follows:

10.1.4. HRAs are required under the Conservation of Habitats and Species Regulations 2017 which is directed by the Habitats Directive 92/43/EEC. A HRA is used to determine whether a project would likely have significant impacts on the conservation objectives of **Natura 2000 sites**, designated for their European importance for nature conservation, which include Special Protection Areas (SPAs) **and**, Special Areas of Conservation (SAC), ~~Sites of Special Scientific Interest (SSSI), Marine Conservation Zones (MCZs) and RAMSAR sites.~~ **An appropriate assessment is also required, as a matter of Government policy, for potential SPAs, candidate SACs and listed RAMSAR Sites (i.e. wetland sites of international importance designated under the Ramsar Convention).** Any project which has the potential to impact upon these designations will be subject to a HRA; therefore, Appendix 2 details the European sites within or adjoining the Authority which could be affected by a proposed project. Different consents are also likely to apply to those developments which affect these European sites which **work are also required in addition to a ~~outside of the~~ planning system consent.** **It should be noted that the need for licenses are also relevant to developments that are not subject to a HRA.** Natural Resources Wales (NRW) **and the Marine Management Organisation (MMO)** can provide further details regarding the species and marine licences which would likely be needed **in relation to development proposals.**

Section 10.1.5 - Council agrees with comments. Amend paragraph 10.1.5 as follows:

10.1.5. Where a HRA is considered to be required, **the competent**

	<p>for an Appropriate Assessment. Both stages of HRA (Test of Likely Significant Effect and Appropriate Assessment) also need to consider in-combination effects. We therefore recommend you reconsider the wording of this section for consistency with the legislation and case law.</p> <p>Other Matters</p>	<p><u>authority, which is likely to be</u> the Local Planning Authority, must undertake a screening test known as a Test for Likely Significant Effect (TLSE). If the findings of the test indicate the potential impact would <u>may have a detrimental effect undermine the conservation objectives for any feature of a European site</u> this triggers an Appropriate Assessment. <u>Both stages of the HRA need to consider the proposal alone and in-combination with other plans or projects.</u> This assessment is carried out by the Council, however, the applicant must supply the information required to undertake the evaluation. Any assessment must precede the planning decision and where the outcome of the Appropriate Assessment <u>cannot rule out a potential adverse effect, and no alternative solutions can be identified, then the project can only then proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.</u> is unfavourable it is unlikely the development would obtain planning consent. As NRW are the conservation body for Wales they would play an integral role in any HRA and would need to be consulted on all applications which would require one.</p>
Cadw	<p>Thank you for inviting Cadw's comments on the Vale of Glamorgan's draft Renewable Energy SPG. We have the following comments to make.</p> <ul style="list-style-type: none"> • In order for Cadw to provide detailed advice, please could we be provided with clearer maps (or shape files) for appendices 4 and 7; • Paragraph 5.2.4 could make reference to Welsh Government publication "The Setting of Heritage Assets in Wales"; • Paragraph 7.7.2 should refer to Registered Historic Parks and Gardens and Scheduled Monuments; • The following publications should be added to Section 9 (Further Guidance and Information): Managing Change to Registered Historic Parks and Gardens in Wales Heritage Impact Assessment in Wales Managing Change to Listed Buildings in Wales • We recommend that The Historic Environment Assessment 	<ul style="list-style-type: none"> • The Council received comments on the close date of the consultation unfortunately due to this there was no time available to send over the shapefiles relating to the appendices maps for comments. • The Council agrees with the comments. Amend paragraph 5.2.4 as follows: 5.2.4. ...Where this is unlikely to mitigate the potential harm of development in sensitive locations applicants should consider other renewable technologies which are likely to have less of an impact. <u>Welsh Government have produced detailed guidance on how the setting of historic assets should be considered in Wales, developers are advised to refer to this guidance where appropriate.</u> (a footnote has also been included referencing the document) • The Council agrees with the comments. Amend paragraph 7.7.3 as follows: 7.7.3. In relation to sensitive historic environments such as conservation areas, listed buildings, <u>registered historic park and</u>

	<p>section of paragraph 10.1.1 should be reworded as follows; <i>Where the development would have an direct impact on the historic environment (scheduled ancient monuments, listed buildings, registered historic parks and gardens, registered historic landscapes, conservation areas, buildings of local significance (county treasures) and archaeological sites of interest, and their settings) an assessment of the potential impacts and any appropriate mitigation methods would be required. (see planning Policy Wales 2018 sections 6.1.9; 6.1.10; 6.1.19; 6.1.21; and 6.1.23)</i></p> <ul style="list-style-type: none"> The maps in Appendices 4, 5 and 7 do not show registered historic landscapes (see planning Policy Wales 2018 section 6.1.21). <p>The publications referred to above are available on the Cadw website www.cadw.llyw.cymru/historicenvironment/publications/?lang=en</p>	<p><u>gardens, scheduled monuments</u> and locally designated historic buildings (known as County Treasures) proposed schemes which are above the micro scale are unlikely to be permitted within or in close proximity to these designations due to the impact such development can have on the historic setting of these areas.</p> <ul style="list-style-type: none"> The Council agrees with the comments. Add new entries within Section 9 Further Guidance and Information as follows: <u>Managing Change to Registered Historic Parks and Gardens in Wales. 2017. Cadw and Welsh Government.</u> (Website link included in text) <u>Heritage Impact Assessment in Wales. 2017. Cadw and Welsh Government.</u> (Website link included in text) <u>Managing Change to Listed Buildings in Wales. 2017. Cadw and Welsh Government.</u> (Website link included in text) The Council agrees with the comments. Amend 4th bullet point of paragraph 10.1.1 as follows: Historic Environment Assessment (where relevant) - Where the development would have an <u>an direct</u> impact on the historic environment, <u>(such as</u> scheduled <u>ancient</u> monuments, listed buildings, conservation areas, buildings of local significance (county treasures) and archaeological sites) <u>of interest</u>, an assessment of the potential impacts and any appropriate mitigation methods would be required. <u>(see PPW 2018 sections 6.1.9; 6.1.10; 6.1.19; 6.1.21; and 6.1.23)</u> Although the maps do not identify the specific registered historic landscapes they have been included where relevant or grouped together under Heritage and Environmental Constraints. The maps have been produced in line with the Welsh Government guidance Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (2015). Therefore not further action is considered necessary.
Glamorgan Gwent Archaeological Trust (GGAT)	Thank you for consulting us on this document for supplementary planning guidance.	The Council agrees that the types renewable energy schemes identified in the draft SPG have both physical and visual impacts. It is considered section 7.7. Historic Environment already covers a number of comments

Within this there is mention of the need to optimise renewable energy generation, whilst viewing these objectives with the obligation to protect designated area, and the historic environment. These objectives are Objective 2 (renewable energy) and Objective 4 (historic environment) in the LDP's key strategic objectives. There are different issues where renewable energy may impact on the historic environment and this impact on the historic environment and archaeological resource should be noted as a consideration.

Renewable energy in relation to the historic environment raises a number of issues. The Draft SPG notes three types of renewable energy that is considered for the area; solar, wind and biomass; the impact of these is both physical and visual.

Firstly, there is the impact that larger scale solar and wind energy may have on any buried archaeological resource, both designated and non-designated, potentially with a need for archaeological mitigation;

Secondly, larger areas and tall structures may have a visual impact on historic assets, both designated and non-designated.

Thirdly, if solar panels or biomass are created within or on historic buildings or structures, whether designated or not, there is the physical and visual impact of these to be considered.

It is likely that these will require planning or listed building permission, and consultation with ourselves at early stage, as your Authority's archaeological advisors, is strongly advised; we can then supply any appropriate recommendations for mitigation, including recommendations for exclusion of some areas, and monitor archaeological work. For larger scale developments, pre-determination mitigation may include archaeological and historic environment assessments, including geophysical or other survey, and potentially field evaluation; there may remain the potential

set out by the representation. However, a number of amendments have been included for clarity that reflect the comments from GGAT. Please see the following amendments.

Amend paragraph 7.7.1 and 7.7.2 as follows:

7.7.1. All renewable energy developments have the potential to impact upon cultural heritage and / or archaeological features. However, it is more likely large scale schemes would have an impact upon these features due to the size of the development site. Where necessary, trial trenching and an archaeological watching brief should be undertaken prior to and during the construction phase of proposed schemes. PPW National policy notes that where nationally important archaeological remains and their settings are likely to be impacted, there should be a presumption in favour of their preservation in situ. Where the remains are of lesser importance the LPA needs to weigh the relative importance of the archaeological features against the need for the proposed development **potentially with the need for archaeological mitigation if appropriate. For larger scale developments, pre-determination mitigation may include archaeological and historic environment assessments, including geophysical or other survey, and potentially field evaluation; there may remain the potential for post-determination fieldwork, post-excavation and reporting. The earliest stage consultation and implementation of mitigation is strongly recommended. For sites where solar or wind turbines are proposed, connection routes to the national grid may also impact on archaeological resource and require mitigation; supplying detail of these early stage ensures informed mitigation. As noted, for sites with non-statutory designations, archaeological mitigation work may be required both pre and post determination to ensure that development complies with PPW, and the TAN24: The Historic Environment.**

7.7.2. All archaeological work undertaken in relation to planning and development issues should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists and it is our Policy to recommend that either a Registered Organisation with the

	<p>for post-determination fieldwork, post-excavation and reporting. The earliest stage consultation and implementation of mitigation is strongly recommended. For sites where solar or wind turbines are proposed, connection routes to the national grid may also impact on archaeological resource and require mitigation; supplying detail of these early stage ensures informed mitigation. As noted, for sites with non-statutory designations, archaeological mitigation work may be required both pre and post determination to ensure that development complies with the newly released Planning Policy Wales Edition 10 December 2018, Chapter 6: Distinctive and Natural Places, and the TAN24; The Historic Environment.</p>	<p><u>CIfA or a member with MCIfA level membership should undertake the work.</u> (Footnote has been included to the corresponding webpages identified in the GGAT comments).</p>
<p>Barry Town Council</p>	<p>Renewable Energy.</p> <ol style="list-style-type: none"> 1. Overall the draft SPG Renewable Energy is excellent in describing the current situation; policy and legislation; constraints, opportunities and criteria for future schemes. 2. Positive impression of proactive policy/stance – reference to the various surveys/mapping data utilised to formulate strategy/policy. 3. There is no reference to thermal heating-ground source heating/energy. 4. Some of the plans in the SPG Appendices require cross referencing with a site list. 5. Biomass – the recent BBC press release of 14 January 2019 regarding wood burners – entitled “Wood Burners and Open Fire Faces Restrictions in New Clean Air Plan”. Clearly this has implications for the future and it is unfortunate that a crossover has occurred on this issue. 6. Implications for Barry – opportunities and encouragement for small domestic renewable projects and those on industrial 	<ol style="list-style-type: none"> 1. Support is welcomed. 2. Support is welcomed. 3. The scope of the SPG was limited to the 3 main types renewable energy generation. This was based upon the number of historic planning applications received and those proposals considered likely to come forward based on the results of the Council’s Renewable Energy Assessment. Due to the number of different renewable technologies available it was considered appropriate to focus the draft SPG on 3 key types. However, national information on renewable energy generation for all types has been included under paragraph 5.1.4 and section 9 Further Information. 4. Comments are noted. The broad level study undertaken as part of the update to the 2016 REA is not intended to create allocations but rather to identify broad areas which have the potential to support different types of renewable energy generation in the Vale of Glamorgan. However, it is accepted that the maps included within the draft were difficult to understand due to their small size therefore, larger and more detailed maps will be included within the final version of the SPG. 5. Comments are noted. Although the Council acknowledges the findings of the report this has yet to be reflected in national policy and legislation. However, the SPG can be updated to

	<p>building/land. The appendix identifies areas/buildings within Barry for potential Heat and Energy opportunities e.g. schools, hospitals, leisure centres and public buildings.</p> <p>7. There is no reference to thermal heating-ground source heating/energy; tidal power and hydropower opportunities.</p> <p>8. Large scale Biomass plants - Members wanted to remind VOG planning department that Environmental Impact Assessments have to be provided as necessary and the SPG needs to reflect/clarify this point.</p> <p>9. The appendices – (6) Heat Opportunities mapping and (7) Assessing Solar Photovoltaic Farm Resources – these need cross referenced lists of sites to relate to the plans.</p> <p>10. Consultations Committee noted that whilst they appreciate the guidance is relevant to land based projects it would have been useful to have information on any energy projects that are plan for off-shore such as tidal power.</p>	<p>reflect any potential change at a later date. Furthermore, section 5.1.10 does acknowledge that air quality is an important consideration and should be maintained.</p> <p>6. Comments are noted.</p> <p>7. See comments to point 3 above.</p> <p>8. There are a number of different scenarios where an EIA would apply which are outlined in the EIA regulations. Rather than repeating the legislation the Council consider it more appropriate to signpost where developers can access this list as well as giving some basic information on what an EIA involves. This is covered in Section 10 paragraphs 10.1.2 and 10.1.3.</p> <p>9. See comments to point 4 above.</p> <p>10. Offshore energy projects are not covered under the remit of the Town and County Planning Act 1990 (as amended) as it relates only to land up to the low tide mark. Therefore, it is not considered appropriate to cover these forms of development within an SPG as the decision for such developments is made by Welsh Ministers as the relevant authority and/or the Marine Management Organisation (MMO).</p>
<p>Jon Brown Designing out Crime Officer Territorial Policing Hub South Wales Police Headquarters</p>	<p>Security</p> <p>Security of energy supplies is important for economic and social well-being. Where facilities are located in areas prone to crime or in isolated areas consideration needs to be given to security further advice can be obtained from Police Design Out Crime Officers.</p>	<p>The comments of the Designing out Crime Officer are noted and accepted. Insert new sub-section 7.14 as follows:</p> <p><u>7.14 Security</u> <u>7.14.1 Security of energy supplies is important for economic and social well-being. Where facilities are located in areas prone to crime or in isolated areas consideration needs to be given to security further advice can be obtained from Police Design Out Crime Officers.</u></p> <p>Add contact details of the Designing out Crime Officer in section 9 Further Advice and Contacts as follows:</p> <p><u>Designing out Crime Officer</u> <u>South Wales Police</u> <u>Territorial Policing Hub</u> <u>South Wales Police Headquarters</u></p>

		<p><u>Tel: 01656 655555 Ext: 29251</u></p> <p><u>Jon.Brown@south-wales.pnn.police.uk</u></p>
Savills	<p>The first is to stress that – whatever approach is taken in the SPG – it should be clear that the LDP’s Local Search Areas for Solar Energy and the SPG’s Updated Potential Site Areas, are not alternatives and the presumption in favour of solar schemes in both locations remains firmly established. Whilst it is not suggested that this is the intention of the SPG given the status of the LDP as a development plan document and the SPG as a material consideration, it is essential that the SPG is amended to reflect the principle that renewable energy generating developments in both locations is fundamentally supported.</p> <p>In this light, Walters suggests that an ‘and’ not ‘or’ approach needs to be taken with the identification of suitable sites for renewable energy generating developments.</p> <p>The second point relates to those sites that currently fall outside of Local Search Areas for Solar Energy and the SPG’s Updated Potential Site Areas. Even if adjustments to these are made as we recommend (see below), it is still important that land outside these areas can be positively considered for solar schemes (and not precluded). This appears to be the approach taken in the subtext of Policy MG30 of the LDP and Paragraph 5.9.8 which suggests that for those areas that have not been identified, whilst there is no presumption in favour of the development, each application should be judged on a case by case basis and on its merits. This must be recognised in the SPG and in the determination of subsequent planning applications – and this appears to be even more important in the light of the approach set out in PPW10.</p> <p>Turning to the Blacklands Farm area, without having seen the methodology used (it is not set out in the SPG) it is not clear why</p>	<p>The Council acknowledges the comments. However, it disagrees with the assertion an SPG is an appropriate policy document to include policy which goes further than the adopted LDP by including new policies. The LDP Development Manual edition 2 identifies that an SPG can</p> <ul style="list-style-type: none"> • “Provide important guidance to expand on topic-based policy to assist the implementation of the LDP (e.g. conservation area detailed policy). • Cover detail and numerical guidelines/thresholds where they may change so as to avoid the LDP becoming quickly outdated and to assist flexibility (e.g. car parking standards) • Provide additional detailed guidance on the type of development expected in an area allocated for development in the LDP. This could take the form of a development brief or a more design orientated master plan.” (LDP Manual, para.7.3.5, 2015). <p>The proposed amendments within the representation are considered to go beyond the scope of what an SPG can do as identified in the LDP Manual. It is acknowledged that the new wording of PPW edition 10 has implications for the adopted LDP but these would need to be considered during a review of the LDP which is planned for 4 years from adoption in 2021.</p> <p>However, it is considered appropriate that further clarity regarding the updated areas was needed within the SPG and the following amendment has been included.</p> <p>Amend paragraph 6.1.3 and 6.3.8 as follows:</p> <p>6.1.3. The updated maps identify possible areas which have the</p>

the land on the eastern side of Five Mile Lane was not identified as either a Local Search Areas for Solar Energy in the LDP or an Updated Potential Site Areas in the SPG.

One solution may be to open up that process and delay adoption of the SPG until a more thorough assessment has taken place (of both the methodology and its findings).

If this isn't possible, then Walters knows that the Blackland Farm area has clear potential for further solar schemes and three main factors explain why. The first is that its characteristics are fundamentally similar to the Local Search Areas for Solar Energy on the western side of Five Mile Lane as well as the 6MW solar array operated by Cenin Renewables Ltd which is located immediately to the south (ref. 2014/00798/FUL). The second is that the site is fundamentally free from constraints that would make it more difficult for a solar development. The site is within Flood Zone A, has a roadside (but screened) frontage, is not Best and Most Versatile agricultural land, and whilst some of it is within a Site of Importance for Nature Conservation, this only covers a very small part of the site that solar panels could avoid. The third is that, unlike most of the Updated Potential Site Areas identified in the SPG, Blackland Farm is located close to a substation where a connection could be achieved.

For these reasons it is entirely sensible to include land East of Five Mile Lane within the SPG's Updated Potential Site Areas (for solar generation schemes).

This is probably as far as we need to go at this time and we hope what we say is clear and helpful. In short, the SPG is an opportunity for the Council to reflect PPW10 and adopt a policy on renewable energy which is both modern and (appropriately) positive. If the invitation to pause on general progress is not taken, the Council can do this with three basic changes to the current draft:

potential to achieve a high yield of energy based upon the update to the high level studies undertaken by the Council. In regards to development management, the evidence produced by the toolkit will allow officers assessing applications for new development sites to understand the opportunities for alternative energy sources such as CHP schemes and can help officers understand why developers have chosen a particular location to develop a renewable or low carbon energy scheme. However, it is advised that further more detailed assessments will need to be carried out to support any future application coming forward in the Vale of Glamorgan. The maps produced by the updated REA (2018) can be viewed at Appendix 3 through to 6. **Where areas have been identified they will need to be considered in more detail as part of any future planning application in line with the relevant LDP policies. However, this must be balanced against the national policy position stated in PPW which states "There should be a presumption in favour of development in identified areas, including an acceptance of landscape change, with clear criteria-based policies setting out detailed locational issues to be considered at the planning application stage." (PPW, para.5.9.8, 2018). Consequently, the resultant identified areas from the updated REA (2018) should not be used to undermine renewable energy development proposals outside of the identified areas which would still need to be assessed on a case by case basis based on their merits.**

6.3.8. Appendix 7 shows the areas within the Vale of Glamorgan which are considered to have the highest potential in terms of generation capacity and the lack of major planning constraints for solar energy developments. This map builds upon the 6 local search areas identified under LDP Policy MG30 - Local Search Areas for Solar Energy based upon the update to agricultural land classification which now differentiates between 3a and 3b agricultural land. **The updated potential solar search areas do not replace those identified under LDP Policy MG30 - Local Search Areas for Solar Energy but rather identifies other areas which also have solar energy potential based upon an update within the evidence base. These new areas of potential solar energy should be viewed as an indication of solar energy potential and not as a**

	<p>1. As required in Paragraph 5.7.8 and 5.9.1, an ambitious target needs to be set for the generation of renewable energy;</p> <p>2. To achieve this, there must be a presumption in favour of development on the identified sites for renewable energy as required in Paragraph 5.9.8, as well as a pragmatic approach to the determination of proposals on sites outside the identified areas with each site assessed on a case by case basis and on its merits;</p> <p>3. Sites where there is known potential can be identified now – and land on the eastern side of Five Mile Lane at Blackland Farm is an ideal candidate (because of its lack of constraints and its clear ability to deliver solar schemes.</p> <p>I trust this representation is helpful and please do get in touch if you wish to discuss its contents further.</p>	<p><u>specific area of safeguarded land for solar development. Within the identified areas further refinement would need to be undertaken to identify specific opportunities for detail development proposals. Any development proposals in the identified areas would still need to demonstrate that they would not have an unacceptable impact on adjoining land in terms of the impact on amenity, heritage assets and the wider environment as well as complying with all relevant policies within the LDP. However, this would need to be considered in light of PPW which states “there should be a presumption in favour of development in identified areas, including an acceptance of landscape change” (PPW, para.5.9.8, 2018).</u></p> <p>Furthermore the SPG has been updated through out to account for the changes in the recent PPW 10.</p>
Friends of the Earth	The SPG should be more positive to wind power in the coastal zone; also have positive policies for connecting Severn Estuary tidal and wave devices into the electricity grid.	<p>The Council acknowledges the objection however no further action is considered necessary. This is based upon the view that the Council’s approach does not prejudice against wind turbine development in the coastal area but does emphasise the need to consider the potential impact upon the area in line with guidance set out under PPW.</p> <p>In relation to the onshore elements of an offshore project, a developer may pursue deemed planning permission under Section 90 (2) of the Town and Country Planning Act 1990. On granting consent under Section 36 of the Electricity Act 1989 the Secretary of State may direct that planning permission for that development and any ancillary development is granted. In these cases the application would need to be considered on a case by case basis due to the diversity of applications and would therefore not warrant further policy consideration at the SPG level.</p>
Tourism and Leisure Development (LATE REPRESENTATION)		
Organisation	Comment Received	Council Response
Reading Agricultural	Section 2	This representation was received one week after the close of the public

<p>Consultants</p>	<p>2.1 is strong on rural/countryside diversification. Coastal sites are outside the settlement boundary but its development would not be seen as farm diversification, would it? I think such sites would be defined as 'coastal' So if 2.1 could give equal weight to the other points within SP11 highlighted in yellow that would be good. Rural diversification is only one of several points in SP11.</p> <p>'LDP 2017 SP11 Tourism and Leisure: Proposals which promote the Vale of Glamorgan as a tourism and leisure destination will be favoured. Existing tourism and leisure facilities will be protected and enhanced, and favourable consideration will be given to proposals which: 1. Enhance the range and choice of the Vale of Glamorgan's tourism and leisure opportunities, particularly through the provision of all year round facilities and a range and choice of visitor accommodation in appropriate locations; 2. Favour rural diversification and the local economy; and 3. Protect existing tourism assets and promote the sustainable use of the countryside and the Glamorgan Heritage Coast.'</p> <p>The second bullet on page 8 is more balanced but does say 'in particular' which is not how the SP11 wording comes across – it is point 1 then point 2....</p> <p>Section 5</p> <p>5.1.2 Why new 'rural' tourism and leisure... why not just new tourism and leisure dev?</p> <p>5.3.1 is good for us re the site's accessibility by sustainable modes of transport and it states that new parking provision needs to be sensitively integrated to minimise visual impact</p> <p>5.3.2 Ref a travel plan (not a capping of visitor numbers) so we like that.</p> <p>5.4.1 Good highlighting of sensitivity of change in amenity being</p>	<p>consultation exercise and has therefore not been considered.</p>
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higher in rural areas and states that new dev should be in harmony with local natural and built env –

5.6.1 Character – only refs the Heritage Coast (further west of the site) so I think it would be worth asking for SPG to define character for areas outside of the heritage coast, which undoubtedly have a character.

5.6.1 Refs a doc that gives advice on how businesses can demonstrate the uniqueness of the Glamorgan Heritage coast to visitors and locals but this is a video aimed at B&B owners really. The Glamorgan Heritage Coast area starts at Aberthaw but the interpretation strategy may be relevant when it comes to detailed design.

5.7.1 Related to LVIA – could do with some guidance on coastal development sensitivities/guidance e.g. seascape rather than ref national guidance, but this might be in the Design in the Landscape SPG...

Section 7

This whole section is skewed towards rural/farm/countryside. Many coastal sites are next to a settlements but would not fall into any of these perhaps. Could the Section 7 title be changed to remove the 'rural' to open up more advice for different locations as policy MD13 is about this type of dev, not just rural/farm/countryside? Could 'New Coastal Tourism' be added and/or 'extensions to existing tourism and leisure developments' as a section within this section. Coastal is hardly referred to – most refs to location are 'rural' 'farm' or 'countryside'

7.1.1 'or outside settlements where they form part of a rural enterprise or farm diversification scheme or the conversion of an existing rural building

7.11 Low impact sustainable tourism doesn't have to be 'rural' but

this section gives that impression. Most rural locations would not have good transport links.

Appendices

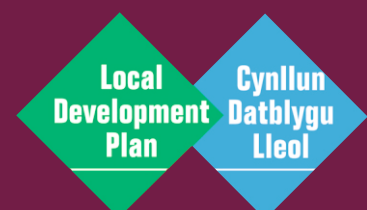
Why aren't any larger coastal sites featured?

Tourism and Leisure Development



Supplementary Planning Guidance

March 2019



Tourism and Leisure Development ~~Draft~~ Supplementary Planning Guidance

This document is available in other formats upon request e.g. larger font. Please see contact details in Section 9.

Contents

1. Introduction	1
2. Purpose of the Supplementary Planning Guidance	2
3. Status of the Guidance	3
4. Legislative and Planning Policy Context	4
5. Planning Considerations for Tourism and Leisure	13
6. Permitted Development Rights and Tourism / Leisure Developments	17
7. Proposals for New Rural Tourism and Leisure Related Developments.....	19
8. Safeguarding Existing Tourism and Leisure Facilities.....	25
9. Further information and Advice.....	26
10. Appendices	28
10.1. Appendix 1 – Vale of Glamorgan STEAM Tourism Survey 2016 Results Summary.....	28
10.2. Appendix 2: Map Showing the Wales Coastal Path, Glamorgan Heritage Coast and Honey Pot Locations	29
10.3. Appendix 3: Examples of Tourism and Leisure Developments in the Vale of Glamorgan	30

1. Introduction

- 1.1. Tourism and leisure plays an important role in the Vale of Glamorgan's economy, particularly in the countryside where it contributes significantly to rural diversification. The authority benefits from a **distinctive tourism offer by virtue of its** vast stretch of coastline (which includes a stretch of the Glamorgan Heritage Coast as well as traditional sea side destinations such as Barry Island and Penarth), large swathes of attractive countryside, country parks, historic market towns such as Cowbridge and numerous picturesque rural villages all of which are important visitor attractions.
- 1.2. While the Vales' proximity to Cardiff provides a substantial local catchment area for day visitors, it also attracts longer stay tourists wishing to explore more widely across South Wales. **In addition, Cardiff Airport provides further opportunities for wider national and international connectivity for tourism.** The Vale of Glamorgan is frequently referred to as "the green lung of South East Wales" and the visitor economy provides important employment opportunities, services and facilities that also benefit the needs of local communities. In 2016, the annual STEAM (Scarborough Tourism Economic Activity Model) survey recorded that tourism in the Vale of Glamorgan attracted almost 4 million visitors, supported almost 3,000 full time equivalent jobs either directly or indirectly and generated in excess of £220 million of revenue to the authority's annual economy (see Appendix 1).
- 1.3. Although new and enhanced tourism and leisure facilities can provide substantial benefits for visitors, residents and the local economy, they can also have negative impacts on local natural and built environments if they are not properly managed or mitigated. For example, when large numbers of people visit one place, a proliferation of tourist facilities and associated paraphernalia such as signage and advertising can have a detrimental visual impact upon the surrounding area. In addition, emissions from visitor's cars can increase air pollution to the detriment of the local community.
- 1.4. In this regard, the planning system has a pivotal role to play in terms of safeguarding and enhancing existing tourism and leisure facilities and managing new developments to ensure that they are delivered sustainably and in appropriate locations. Consequently, the Vale of Glamorgan Adopted Local Development Plan 2011-2026 (LDP) contains a planning policy framework which seeks to encourage new investment in appropriate tourism and leisure facilities and seeks to protect and enhance existing facilities for the benefit of local residents, visitors and the local economy.

2. Purpose of the Supplementary Planning Guidance

- 2.1. This Supplementary Planning Guidance (SPG) has been prepared to support and provide additional detail to the relevant LDP policies. A number of LDP policies favour proposals for new or enhanced tourism and leisure developments as well as the protection of the Vale's natural and built tourism assets which are important visitor attractions. The LDP also recognises that many of the traditional sectors of rural employment such as agriculture and forestry are in decline. Accordingly, the LDP also seeks to maximise opportunities for rural diversification such as low impact, sustainable tourism and leisure uses. For example, Policy SP 11 (Tourism and Leisure) favours tourism and leisure proposals which encourage rural diversification and promote the sustainable use of the countryside and the Glamorgan Heritage Coast (GHC).
- 2.2. This SPG has therefore been prepared to provide clarity to applicants on how such proposals will be assessed against the LDP policy framework. Specifically, it includes guidance on:
- Relevant material planning considerations;
 - Permitted development rights and tourism / leisure related developments;
 - Different types of tourism and leisure developments;
 - Protecting existing tourism and leisure facilities; and
 - Good practice examples of local tourism and leisure developments.
- 2.3. It is not intended to repeat guidance covered sufficiently within legislation and national planning policy. However, the key parts of relevant Acts and national planning policy are referred to in section 4 of the SPG for ease of reference.

3. Status of the Guidance

~~3.1. This guidance was approved by Cabinet as a draft for public consultation on the XXX. The Council will take account of comments received during the six week public consultation exercise before finalising the document for development management purposes.~~

~~3.2. Planning Policy Wales, Edition 9, November 2016 (PPW) advises that SPG may be taken into account as a material consideration where it has been prepared in consultation with the general public and interested parties and is consistent with the development plan. Once adopted, the SPG will be a material consideration in the determination of future planning applications and appeals in the Vale of Glamorgan.~~

3.1 Draft guidance was approved for public consultation purposes by Cabinet on 3rd December 2018 (minute no. C502 refers). A six week public consultation was subsequently held between 4th January 2019 and 15th February 2019. The relevant documentation was made available for viewing at the Council's main offices and on the web site during the consultation period.

3.2 The Council considered the representations received and made changes where appropriate. This SPG was approved by Cabinet on x x 2019 (minute no. x refers) and will be a material consideration in the determination of relevant planning applications and appeals.

4. Legislative and Planning Policy Context

4.1. National Legislation

- 4.1.1. **The Planning (Wales) Act 2015** - seeks to deliver a planning system which is fair, resilient, enables development and helps create sustainable places. The Act supports the principle of sustainable development and provides opportunities to protect and enhance our most important built and natural environments which provide valuable tourism and recreation opportunities.
- 4.1.2. **Well-Being of Future Generations (Wales) Act 2015** - seeks to improve the social, economic, environmental and cultural well-being of Wales. It contains seven well-being goals which local authorities as well as other public bodies must seek to achieve in order to improve well-being both now and in the future, several of which support this SPG's promotion of low impact sustainable rural tourism and leisure uses.
- 4.1.3. **Environment (Wales) Act 2016** – puts in place a modern statutory process to plan and manage our natural resources in an integrated and sustainable way.
- 4.1.4. **The Marine and Coastal Access Act 2009** – provides a legislative framework for the seas, based on marine spatial planning, that aims to balance conservation, energy and resource needs. It requires all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area to do so in accordance with the Marine Policy Statement (2011) unless relevant considerations indicate otherwise.
- 4.1.5. **Planning (Listed Buildings and Conservation Areas) Act 1990** – provides a legislative framework for buildings and areas of special architectural or historic interest.
- 4.1.6. **Historic Environment (Wales) Act 2016** – provides a legislative framework for the protection and the sustainable management of the Welsh historic environment.

4.2. National Policy Context

Planning Policy Wales, Edition 10 (December 2018)(Edition 9)(November 2018) (PPW):

~~PPW sets out the land use planning policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs). Chapter 11 on Tourism, Sport and Recreation sets out the Welsh Government's aim for tourism to grow in a sustainable way and to make an increasing contribution to the economic, social and environmental well-being of Wales (paragraph 11.1.2 of PPW refers).~~

- ~~4.2.3. PPW recognises that tourism is vital to economic prosperity and job creation in many parts of Wales. It also states that tourism is a significant and growing source of employment and investment across Wales and that it can be a catalyst for environmental protection, regeneration and improvement in both urban and rural areas. In terms of the latter, paragraph 7.3.1 of PPW states that “small scale enterprises have a vital role in promoting healthy economic activity in rural areas, which can contribute to both local and national competitiveness. New businesses in rural areas are essential to sustain and improve rural communities.”~~
- ~~4.2.5. In respect of the planning system, PPW states that sustainable tourism should be encouraged in ways which enable it to contribute to economic development, conservation, rural diversification, urban regeneration and social inclusion, recognising the needs of visitors and local communities.~~
- ~~4.2.7. In both urban and rural areas, tourism related development is considered to be an essential element in providing for a healthy, diverse, local and national economy. Moreover, it can contribute to the provision and maintenance of facilities for local communities. However, PPW clarifies that such development should be sympathetic in nature and scale to the local environment (for example in undeveloped coastal areas) and to the needs of the visitors and the local community (paragraph 11.1.7 of PPW refers).~~
- ~~4.2.1. National guidance is clear that development plans should encourage the diversification of farm enterprises and other parts of the rural economy for appropriate tourism and leisure uses, subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value (paragraph 11.2.7 of PPW refers).~~
- 4.2.1. **PPW sets out the land-use planning policies of the Welsh Government. PPW is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters which together with PPW provide the national planning policy framework for Wales.**
- 4.2.2. **With regard to tourism, PPW notes that it involves a wide range of activities, facilities and types of development and that it is vital to economic prosperity and job creation in many parts of Wales. It states that tourism can be “a catalyst for regeneration, improvement of the built environment and environmental protection” (paragraph 5.5.1 refers). In addition, it points out that it can also assist in enhancing the sense of place of an area which has an intrinsic value and interest for tourism.**
- 4.2.3. **In respect of the planning system, PPW encourages new tourism related development that contributes to economic development, conservation, biodiversity, rural diversification, urban regeneration, social inclusion and well-being. To support the continued success of existing established tourist areas (such as Barry Island and Penarth), PPW seeks to encourage new appropriate, well designed, good quality tourist related development (e.g. new visitor accommodation).**

- 4.2.4. **In rural areas, new and enhanced tourism facilities are considered to be an essential element in providing for a healthy and diverse economy. In addition, they can contribute to the provision and maintenance of facilities for local communities. National planning guidance is clear that LDPs should encourage rural diversification proposals for suitable new uses including tourism and leisure. However, PPW emphasises that such development should be sympathetic in nature and scale to avoid any damage to the environment or the amenity of residents or visitors.**

Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010) (TAN 6):

- 4.2.5. TAN 6 provides guidance on how the planning system can help support sustainable and vibrant rural communities. Paragraph 2.2.2 states that “new development can help to generate wealth to support local services, ensuring that communities are sustainable in the long term.” In addition, the TAN emphasises the importance of creating strong rural economies to support sustainable and vibrant rural communities.
- 4.2.6. It provides advice on matters including sustainable rural communities and economies, rural affordable housing, rural enterprise dwellings, one planet developments, sustainable rural services and sustainable agriculture. The TAN defines rural enterprises as comprising of businesses directly related to agriculture and forestry, land management activities and tourism and leisure enterprises.

Technical Advice Note 13 - Tourism (1997) (TAN13):

- 4.2.7. TAN 13 provides guidance on tourism related issues in planning including matters relating to hotel development, holiday and touring caravans and seasonal and holiday occupancy conditions. As with PPW, the TAN recognises the contribution that tourism makes to the Welsh economy through employment and the benefits that tourism can bring to local economies and communities, particularly in rural areas.

Technical Advice Note 14 – Coastal Planning (1998) (TAN 14)

- 4.2.8. TAN 14 provides guidance on key issues relating to planning for the coastal zone and recreational development along the coast, including the type of proposals for development, nature and landscape conservation, recreation and coastal specific considerations.

Technical Advice Note 23 - Economic Development (2014) (TAN 23)

- 4.2.9. TAN 23 provides guidance on the role of land use planning in economic development. In terms of tourism and leisure, it recognises that the re-use and adaptation of existing rural buildings has an important role to play in meeting the needs of rural areas for a range of uses including tourism and leisure.

Technical Advice Note 24 – The Historic Environment (2017) (TAN 24)

- 4.2.10. TAN 24 provides detailed guidance on how different aspects of the historic environment such as listed buildings, scheduled monuments, conservation areas and historic landscapes etc. should be considered by owners, developers and public bodies in the planning process. **The TAN also refers to non-designated assets and their management in development.** This is particularly important as the Vale of Glamorgan has a significant number of historic assets **as well as non-designated assets** which could be **positively or negatively** affected by proposals for new tourism and leisure development. **In terms of the historic environment, potential tourism and leisure development proposals could include new buildings and associated facilities such as parking, information boards, signage, footpaths and trails or the conversion of existing historic buildings and maintenance of historic buildings / structures that attract visitors such as castles, churches, piers and earthworks sites such as coastal remains.**

Draft Welsh National Marine Plan (WNMP)

- 4.2.11. The Draft WNMP sets out the Welsh Government's policy for the sustainable development of the Welsh marine planning area for both inshore and offshore regions. It seeks to ensure the sustainable management of marine natural resources and supports "blue growth" by setting out how and where new proposals should be developed.

4.3. Local Policy Context

The Vale of Glamorgan Adopted Local Development Plan (LDP) (2011-2026):

- 4.3.1. The LDP was formally adopted by the Council on 28th June 2017 and constitutes the development plan for the area. The LDP provides the local planning policy framework for assessing planning applications for new development / uses and contains a number of relevant objectives associated with new rural tourism and leisure proposals. These are set out below:
- 4.3.2. **Objective 1** seeks "to sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all." The supporting text emphasises the need for new development to be of an appropriate scale to its location, support the local economy and sustain and wherever possible improve local services and facilities. The provision of new and enhanced tourism and leisure proposals can be enjoyed by both visitors and local communities alike as well as providing important local employment opportunities.
- 4.3.3. **Objective 2** aims "to ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." New tourism and leisure developments

should therefore be accessible by a variety of sustainable means of travel and incorporate sustainable design and building solutions.

- 4.3.4. **Objective 4** refers to the protection and enhancement of the area’s historic, built and natural environment. The Vale of Glamorgan benefits from a significant number of these environmental assets which are highly valued by local residents and visitors alike.
- 4.3.5. **Objective 8** seeks to “foster the development of a diverse and sustainable local economy that meets the needs of the Vale of Glamorgan and that of the South East Wales region.” In both urban and rural areas, tourism and leisure related development is an essential element in providing for a healthy, diverse, local and national economy. The LDP recognises this and favours proposals for new and improved sustainable tourism and leisure facilities in appropriate locations.
- 4.3.6. **Objective 9** aims “to create an attractive tourism destination with a positive image for the Vale of Glamorgan, encouraging sustainable development and quality facilities to enrich the experience for visitors and residents”. This objective is supported by a suite of LDP policies that seek to protect and enhance the range and choice of existing tourism and leisure facilities in the Vale of Glamorgan.
- 4.3.7. In order to support the LDP vision and objectives, there are a number of strategic policies, managing growth policies and managing development policies which are relevant to new tourism and leisure development. However, it should be noted that other LDP policies may apply depending on the nature of the proposal and each application will be dealt with on its own merits. The relevant LDP policies are summarised below:
- **Policy SP1 – Delivering the Strategy** – This policy sets out the framework for delivering the LDP strategy and criterion 7 refers specifically to promoting opportunities for sustainable tourism and recreation. A number of the other criteria e.g. 6 and 8 are also relevant.
 - **Policy SP10 – Built and Natural Environment** – This policy recognises the importance of preserving and enhancing the built and natural environment which provides valuable recreation and tourism opportunities for visitors and local residents alike.
 - **Policy SP11 – Tourism and Leisure** – This policy favours proposals which promote the Vale of Glamorgan as a tourist and leisure destination as well as those which protect and enhance existing facilities. In particular, it favours proposals which support rural diversification and the rural economy, protect existing tourism assets and promote the sustainable use of the countryside and the GHC.
 - **Policy MG17 – Special Landscape Areas (SLAs)** – This policy identifies 6 SLAs which are considered to be important for their geological, visual,

historic or cultural significance. In such areas, careful consideration must be given to the design elements of the proposal such as siting, orientation, layout and landscaping to ensure that the special qualities and characteristics of the SLA are protected.

- **Policy MG 27 – Glamorgan Heritage Coast (GHC)** – This policy recognises the special natural environmental qualities of the GHC and restricts the types of development that will be permitted. However, the supporting text recognises that it is an important visitor attraction and supports proposals for low impact tourism and informal recreation.
- **Policy MG 29 – Tourism and Leisure Facilities** – This policy favours the provision of all year round tourism and leisure facilities. It also refers to ~~several~~ tourism related allocations in Barry and the Rural Vale which seek to enhance the existing tourism offer in these areas and create more local employment opportunities.
- **Policy MD1 – Location of New Development** – This policy sets out the framework for future development to take place on unallocated sites within the Vale of Glamorgan. Criterion 3 encourages the provision of new tourism and leisure development where appropriate.
- **Policy MD2 – Design of New Development** - This policy sets out the key principles for new development in terms of design to create high quality, healthy, sustainable and locally distinct places. Criterion 1 is of particular relevance and states that proposals should positively contribute to the context and character of the surrounding natural and built environment and protect existing features of townscape and landscape interest.
- **Policy MD 5 – Development within Settlement Boundaries – This policy sets out the criteria which new development within settlement boundaries is assessed. Criteria 3, 4 and 6 are of particular relevance to new tourism and leisure development proposals. Criterion 5 seeks to retain existing tourism buildings and facilities.**
- **Policy MD8 – Historic Environment** - This policy states that development proposals must protect the qualities of the historic environment such as conservation areas, listed and locally listed buildings, designated landscapes and historic parks and gardens. The supporting text to the policy states that proposals which enhance and increase the public enjoyment of these historic environments will be encouraged provided that the facilities do not conflict with their conservation.
- **Policy MD 11 – Conversion and Renovation of Rural Buildings** – This policy acknowledges that with changes in farming practices, many rural buildings are no longer needed or unsuitable for modern needs. Accordingly, it favours the retention and conversion of these redundant buildings to new

uses including tourism and leisure facilities which make a positive contribution to the rural economy.

- **Policy MD13 – Tourism and Leisure** – This policy favours the provision of new or enhanced well-designed tourism and leisure facilities in appropriate locations. Accordingly, it favours proposals which form part of a rural enterprise or farm diversification scheme as well as sustainable low impact tourism and leisure proposals in the countryside. It also seeks to prevent the loss of existing tourism and leisure facilities.
- **Policy MD17 – Rural Enterprise** – This policy recognises that many of the traditional sectors of rural employment are in decline. It seeks to encourage proposals for new small scale sustainable employment uses in rural areas which could include tourism and leisure uses.

The Vale of Glamorgan LDP Coastal Study (2013)

- 4.3.8. The Coastal Study was prepared by White Consultants and informed the preparation of the LDP. The document examines the current development pressures along the Vale of Glamorgan coastline, (including the GHC) and makes a number of recommendations relating to the management of development in coastal areas.

The Vale of Glamorgan Destination Management Plan 2018 – 2020 (DMP)

- 4.3.9. All destinations in Wales are encouraged by Welsh Government to develop a DMP to formally outline their area's priorities for tourism development. The DMP provides a framework for developing, improving and enhancing the visitor experience within the Vale of Glamorgan. The overarching vision of the DMP is:

'to create an attractive and vibrant tourism destination with a positive image for the Vale of Glamorgan capitalising on the Heritage Coast and proximity to Cardiff, encouraging the generation of higher spend and local income through sustainable development and quality facilities to enrich the experience for visitors and residents.'

- 4.3.10. The DMP recognises that the Vale of Glamorgan is an area with unrivalled natural attributes and states that the majority of tourists come here to enjoy the landscape, countryside and beaches. The DMP also contains several ambitions to complement the vision which include "to be known as a rural escape; a welcome alternative from which to explore the capital city of Wales, offering a stunning coastline and beautiful countryside."

The Vale of Glamorgan Community Strategy 2011 – 2021

- 4.3.11. The Vale of Glamorgan Council's Community Strategy 2011 - 2021 seeks to build upon the authority's tourism strengths. It includes the aspiration for the Vale of Glamorgan to become "the Green Lung of South East Wales" recognising the

importance of ensuring that tourism is undertaken in a sustainable manner so that the natural and built tourism assets are maintained for the enjoyment of future generations.

The Vale of Glamorgan Corporate Plan 2016 – 2020

- 4.3.12. The Vale of Glamorgan's Corporate Plan 2016 – 2020 sets out a clear vision for the future: "Strong communities with a bright future" and the 4 key values in delivering that vision are 'ambitious', 'open', 'together' and 'proud'. Tourism and Leisure sits at the heart of wellbeing outcome 2: an environmentally responsible and prosperous Vale. Objective 3: Promoting regeneration, economic growth and employment and objective 4: Promoting sustainable development and protecting our environment are relevant to tourism and leisure development.

Vale of Glamorgan Rural Local Development Strategy and Action Plan (2014 – 2020)

- 4.3.13. The Rural Local Development Strategy describes the priorities for action in the rural parts of the authority under the Rural Development Programme for Wales. The strategy has been subject to considerable consultation and is based on a wide range of evidence and analysis. It recognises that the Rural Vale has many important and somewhat under-utilised assets which could help to create more opportunities for jobs and businesses. For example, the Strategy aims to create more economic value from the natural and historic built environment to help increase their business and employment potential and develop more business tourism opportunities.

Vale of Glamorgan Public Service Board Well-being Plan 2018 – 2023 Our Vale – Our Future

- 4.3.14. **The PSB well-being plan details the four well-being objectives which provide the framework for our core collaborative activities over the next five years. Delivery of the plan will lead to significant changes in how public services are provided in the Vale of Glamorgan and how local communities are engaged. The plan will lay the foundations for the PSB to achieve the vision for the Vale. In terms of tourism, the plan seeks to work with local businesses and industry to maximise the economic benefits of the environment through tourism and agriculture whilst taking steps to minimise negative impacts and seek opportunities to enhance the environment of the Vale.**

Commercial Opportunities Feasibility Studies

- 4.3.15. A Commercial Opportunities Feasibility Study was commissioned by the Council's Creative Rural Communities (CRC) team in 2015 to explore the viable commercial opportunities, outdoor activities and events which could enhance the development of business and employment in and around the GHC. The focus of the 2015 feasibility study was to look at project opportunities in three of the main 'entry points' along the GHC at Ogmore by Sea, Dunraven Bay at Southerndown, and Cwm Colhuw, Llantwit Major.

- 4.3.16. A follow up stage 2 report was commissioned by the CRC team in 2016 which examined the feasibility of 3 short listed projects at the Glamorgan Heritage Coast Centre, Dunraven Gardens and the Pen-Y- Bont surf lifesaving club. The follow up report had a specific emphasis on exploring viable commercial opportunities that will develop destination appeal and enhance the development of businesses in the GHC.

Coastal Activities Feasibility Study

- 4.3.17. **A Coastal Activities Feasibility Study was commissioned by the Council's CRC team in 2018. This study builds on the Commercial Opportunities Study and will look at a range of specific adventure activities and the appropriateness of them along the Vale of Glamorgan coastline.**

4.4. Supplementary Planning Guidance

- 4.4.1. The Council has also produced a number of other Supplementary Planning Guidance (SPG) documents in support of the LDP. The following SPG may be of relevance to new rural tourism and leisure related developments:

- Conversion and Renovation of Rural Buildings
- Design in Landscape
- Trees, Woodlands, Hedgerows and Development
- Biodiversity and Development
- Conservation Areas in the Rural Vale
- Parking Standards
- Planning Obligations
- Travel Plans
- Minerals Safeguarding

- 4.4.2. The following sections provide additional guidance on the considerations and requirements to be taken into account when submitting planning applications for new tourism and leisure related developments or for changes of use of existing tourism / leisure facilities to alternative uses.

5. Planning Considerations for Tourism and Leisure

5.1.1. The tourism vision for the Vale of Glamorgan set out in the Destination Management Plan (see paragraph 4.3.9 above) helps to define ambitions and priorities that will greatly contribute to future tourism growth **particularly in areas such as Barry and Barry Island, Penarth, the Glamorgan Heritage Coast and the Rural Vale.** The LDP seeks to build on this vision by favouring new or enhanced development proposals which promote the Vale of Glamorgan as an attractive tourism and leisure destination and resists the loss of existing tourism and leisure facilities (objective 9, Policies SP 11 and MD13 refer). **The importance of Tourism and Leisure in settlements such as Barry, Cowbridge, Llantwit Major, Penarth as well as the minor rural settlements is also noted in the LDP area objectives.**

5.1.2. Notwithstanding the above, it is important that new ~~rural~~ tourism and leisure development is appropriately ~~located~~ and sympathetic in nature and scale to the local environment and to the needs of both visitors and the local community. Proposals for new tourism and leisure development will be assessed in accordance with the relevant LDP policies / SPG together with any relevant material planning considerations as set out below. However, it should be noted that the following list is not exhaustive and planning applications will be dealt with on a case by case basis.

5.2. Flood Risk

5.2.1. Welsh Government guidance states that new development should be directed away from those areas which are at high risk of flooding. It is very unlikely that new tourism and leisure related developments will be able to be justified against the tests set out in TAN 15 Development and Flood Risk. Accordingly, new development should be directed away from Zone C and towards suitable land in either Zone A or Zone B, where river or coastal flooding is less of a concern. **In particular, highly vulnerable development should not be permitted in Zone C2 of the Development Advice Map contained in TAN 15 (paragraph 6.2 of TAN 15 refers). Tourism and leisure developments could include campsites, conversions of barns to holiday lets, wedding venues with overnight accommodation etc., which are considered to be highly vulnerable development.**

5.3. Access / Highway Impact

5.3.1. All new development proposals should provide safe highway access to the appropriate highway standards. The Council is keen to encourage the increased use of sustainable modes of transport and to reduce the number of private vehicle journeys. Wherever possible, proposals for new tourism and leisure developments should be accessible by sustainable modes of transport including public transport, cycling and walking. Where new parking provision is to be provided, this will need to be sensitively integrated into the scheme to ensure that the visual impact is kept to a minimum.

- 5.3.2. The majority of new tourism and leisure proposals are likely to be small scale and therefore will not require a formal transport assessment. However, where larger developments are proposed, the Council may require the production of a transport statement to illustrate how any transport issues within and adjoining the site will be addressed. A travel plan may also be required if the impact of the proposed development is likely to be significant or where particular local circumstances exist, such as low levels of on-site car parking.

5.4. Amenity

- 5.4.1. Changes in the use of land can have significant impacts on the amenity of local residents and any existing adjoining uses, particularly in rural areas. New tourism and leisure related developments should therefore be designed in such a way so that they are in harmony with the local natural and built environment.

5.5. Heritage

- 5.5.1. The Vale of Glamorgan has a rich and diverse cultural heritage and its heritage assets are widely dispersed throughout the authority. New tourism and leisure proposals should therefore ensure that the archaeological, architectural, historic and / or cultural assets of the Vale of Glamorgan are conserved and where appropriate enhanced. Where applicable, development proposals should consider the impact **not only on the heritage asset but also it's on the setting of a heritage asset** including any significant views into or out of it, which in many cases are as important as the heritage asset itself. **Further advice on this matter can be obtained from Cadw (www.cadw.gov.wales).**

- 5.5.2. **Any development may have a physical impact on any buried archaeological resource, both designated and non-designated sites or areas, potentially with a need for archaeological mitigation; larger parking areas or new buildings may have a visual impact on historic assets, both designated and non-designated. Changes to historic buildings or structures, whether designated or not, may have both physical and visual impact which should be considered. Conversion of historic buildings to new tourism or leisure uses may also require mitigation by historic building recording, or archaeological fieldwork depending on the archaeological resource. Where applicable, it is recommended that further information regarding archaeological mitigation is obtained from Glamorgan Gwent Archaeological Trust Ltd. (www.ggat.org.uk).**

5.6. Character

- 5.6.1. New tourism and leisure proposals should be sympathetic to the local character and contribute to maintaining a strong sense of place. For example, within the Glamorgan Heritage Coast, the Council has produced a Heritage Coast Sense of

Place Palette¹, which sets out baseline information about the area including culture, biodiversity, heritage, Welsh language, local legends and stories. It also gives advice on how businesses can demonstrate the uniqueness of the Glamorgan Heritage Coast to visitors and local communities. Similarly, in Conservation Areas, the local authority has a statutory duty to ensure that the character of an area is preserved and where appropriate enhanced. Therefore new tourism and leisure development proposals within Conservation Areas will need to have regard to the Conservation Area Appraisal and Management Plans which set out the special qualities of each area.

5.7. Landscape

5.7.1. The landscape impact of new development proposals should form an early part of design considerations and include elements such as location, scale, orientation as well as new and existing landscaping. Proposals should seek to complement and enhance key landscape features including long views and open spaces. In sensitive coastal and rural locations such as the Glamorgan Heritage Coast and Special Landscape Areas, it is important that developments are well integrated into the landscape. It should be noted that a Landscape and Visual Impact Assessment will be required for any development that is likely to have a considerable impact on landscape character, or have a significant visual effect within the wider landscape (by virtue of its size, prominence or degree of impact on the locality) and should be prepared in accordance with the latest Landscape Institute and the Institute of Environmental Management and Assessment Guidelines. Further advice is available in the Design in the Landscape SPG.

5.8. Agricultural Land Quality

5.8.1. National planning policy states that Grade 1, 2 and 3a agricultural land is the best and most versatile (BMV) and should be conserved as a finite resource for the future. Such land 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.” (paragraph ~~4.10.1~~ **3.55** of PPW refers).

5.8.2. It is unlikely that new low impact rural tourism and leisure proposals (e.g. camp sites) would result in the permanent sterilisation of BMV agricultural land. However, there may be instances where such proposals seek to include more permanent elements such as access roads or amenity buildings etc. Where such ancillary infrastructure is required, applicants should seek to protect the BMV agricultural land by utilising existing or temporary buildings or providing temporary forms of access tracks.

¹ <http://www.valeofglamorgan.gov.uk/en/working/Rural-Communities/Our-Achievements.aspx>.

5.9. Biodiversity

- 5.9.1. The Environment (Wales) Act 2016 places a duty on the local planning authority to preserve and enhance biodiversity wherever it occurs. However, with sensitive and appropriate design, implementation and management, the adverse impact of development proposals can be minimised and may even enhance local biodiversity. The Council has prepared SPG on 'Biodiversity and Development' which provides specific guidance on how biodiversity in the Vale of Glamorgan will be conserved and enhanced throughout the planning and development process. The guidance assists developers in meeting the Council's proactive approach towards achieving a high quality natural environment.

5.10. Minerals Safeguarding Areas (MSA)

- 5.10.1. In line with national planning policy, the Council has identified Minerals Safeguarding Areas which seek to protect hard rock and sand and gravel resources within the Vale of Glamorgan from future sterilisation resulting from permanent development.
- 5.10.2. It is unlikely that the types of low impact tourism and leisure development that will be acceptable within rural areas will permanently sterilise identified mineral deposits within the Vale of Glamorgan. However, where more permanent structures e.g. access and service roads are proposed, consideration should be given to protecting any minerals resources present from permanent sterilisation. MSAs are identified on the LDP Proposals Map and the Council has also prepared SPG entitled 'Development in Minerals Safeguarding Areas' which provides further information on proposals affecting a MSA.

5.11. Wales Coastal Path

- 5.11.1. The Wales Coastal Path was officially opened in 2012. It was developed out of a desire to build on the economic success of the other existing coastal paths such as the Pembrokeshire Coast Path National Trail which is a major contributor to the local visitor economy in West Wales. In addition, coastal paths are also considered to be an important initiative in terms of the health and well-being benefits they provide to local residents and visitors alike.
- 5.11.2. The Vale of Glamorgan coastline forms an integral part of the Wales Coastal Path (see Appendix 2) and incorporates natural and built environment assets such as nature reserves and ancient churches. The Wales Coastal Path is regarded as a 'flag ship' tourism project that is capable of bringing significant economic benefits to the coastal communities in the Vale of Glamorgan. Policy SP11 (Tourism and Leisure) in the LDP seeks to protect and enhance existing tourism assets such as the coastal path for the benefit of visitors and the local community alike.

6. Permitted Development Rights and Tourism / Leisure Developments

- 6.1. The use of land as a tented camp site or as a caravan site will require planning permission, unless the use is permitted under the relevant criteria of the General Permitted Development Order (GPDO) (1995) (as amended). Part 4, Class B of the GPDO permits the temporary use of land as a tented camp site for not more than 28 days in total in any calendar year (including set up and dismantling). This does not apply where the land is within the curtilage of a building or is a site of special scientific interest.
- 6.2. Part 5, Class A of the GPDO permits the use of land, other than a building, as a caravan site, in circumstances when a caravan site licence is not required. These circumstances include the following:
- One caravan at any one time, sited on land by a person travelling with that caravan, who brings the caravan on to the land for a period of not more than two nights at a time. This applies for a total of no more than 28 days in a 12 month period.
 - On sites of 5 acres or more, a maximum of three caravans may be sited on the land for a total of no more than 28 days in a 12 month period.
 - Sites occupied and supervised by exempted organisations (e.g. Caravan Club; Showmans Guild; Guides/Scouts Association)
 - Sites approved annually by an exempted organisation and occupied by no more than 5 caravans belonging to members of that organisation certified location
 - Sites used for meetings of exempted organisations for no more than 5 days at a time.
- 6.3. If use of land as a tented camp or as a caravan site is permitted under the GPDO, planning permission is still likely to be required for any permanent new structures, signage, hard standings, roadways or levelling of land that may be necessary to enable the use to go ahead.
- 6.4. It should be noted that each case is different and the need for planning permission depends on the unique characteristics of the use or works, a site's planning history and an interpretation of the law. It is therefore recommended that operators or owners of temporary / seasonal tourism and leisure activities contact the Council in the first instance to ascertain whether planning permission is required for the proposed activity. The Council provides a statutory pre-application advice service in accordance with The Town and Country Planning (Pre-Application Services) (Wales) Regulations 2016 for which a fee is payable depending on the size and scale of the proposed development. Further information on this service can be found on the Council's website.
- 6.5. Any associated 'licensable activity' (e.g. providing entertainment, such as music, dancing or indoor sporting events) on unlicensed premises would require a Temporary Event Notice (TEN) under the Licensing Act 2003. Advice on

licensable activity should be sought from the Council's Licensing Team. In general, an event must have fewer than 500 people at all times (including staff) and last no more than 168 hours (7 days) with a minimum of 24 hours between events. A separate TEN is required for each event held on the same premises and premises can have no more than 15 events per calendar year. Applications for a TEN must be made in advance of the event to the Council's Licensing Team and a fee is payable.

7. Proposals for New Rural Tourism and Leisure Related Developments

7.1.1. LDP Policy MD13 directs new tourism and leisure facilities to locations where new development can be easily integrated within existing settlements, or outside settlements where they form part of a rural enterprise or farm diversification scheme or the conversion of an existing rural building (under policy MD11). Within these locations, proposals such as bed and breakfast accommodation, the conversion of existing rural buildings to holiday accommodation, farm stay holidays or camp sites are encouraged where they are likely to have a limited visual impact on the countryside and require little in the way of ancillary infrastructure.

7.2. Bed and Breakfast Accommodation

7.2.1. The need for planning permission for bed and breakfast accommodation depends mainly on the scale of the proposal. For some small-scale proposals, a planning application may not be needed if the primary use of the house as a private residence is to be maintained. However, it is advisable to contact the Council's planning department for clarification on this matter before submitting a planning application.

7.3. Conversion of Rural Buildings

7.3.1. Proposals which involve the conversion of an existing rural building will be primarily assessed against LDP Policy MD11 (Conversion and Renovation of Rural Buildings). The Council has also produced SPG on this subject which provides further advice on design principles for the conversion of sensitive rural buildings.

7.4. Camping and Caravan Sites

7.4.1. Proposals for new camping and caravan sites (including supporting infrastructure) should be sited unobtrusively to minimise the visual impact on the countryside or coast. Consideration must also be given to the impact on historic and cultural heritage, biodiversity and local amenity, noise and traffic generation. The provision of essential services such as water supply and sewerage facilities must also be taken into account. **Welsh Government Circular 008/2018 on private drainage, (specifically paragraphs 2.3-2.5), states that the first presumption must be to provide a system of foul drainage discharging into a public sewer.**

7.5. Residential Tourism Accommodation

7.5.1. Modern rural tourism and leisure activities are less seasonally restricted than in the past. Accordingly, there is a greater demand for self-catering accommodation, whether this is in new or converted rural buildings or in caravan

/ chalet holiday homes. The Council will use conditions to ensure that new residential tourism accommodation in the countryside is restricted so it is not used as permanent residential accommodation or as a main place of residence. In addition, the Council will also impose a condition requiring the applicant to keep an up to date visitor register at the holiday accommodation which must be available for inspection by the Council upon request.

7.6. Equestrian Activities

7.6.1. The use of land for equestrian activities such as stables, field shelters, riding schools, stud farms and livery stables has become increasingly popular in the countryside, particularly on the edge of settlements. Such development requires planning permission and is generally supported as it contributes to the range and choice of rural tourism and leisure facilities on offer and benefits the rural economy.

7.6.2. However, the design and location of proposals for new or enhanced horse related leisure / commercial development will be assessed against the criteria set out in Policy MD 2 (Design of New Development). Proposals should therefore be of an appropriate scale and be of a high standard of design that positively contributes to the context and character of the surrounding natural landscape.

7.7. Outdoor Rural Tourism / Leisure Attractions

7.7.1. Other outdoor rural tourism / leisure attractions such as farm parks, fisheries, pick your own fruit farms and paintballing are examples of uses which often can operate without the need for a building (or can utilise existing buildings) but may require permission for the change of use of the land. Additionally, proposals for changes of use which do not initially involve new buildings should consider the need for buildings in the future. Where a planning application is required for a change of use, this may be assessed on its impact directly or indirectly on the landscape. The main considerations for the Council will include visual impact, noise pollution, transport and traffic generation, car parking, hours of operation, outdoor lighting, ancillary buildings and storage requirements.

7.8. Business Case for New Rural Tourism / Leisure Developments

7.8.1. Applicants will be required to provide a business or management plan in support of proposals for an entirely new tourism / leisure facility in the countryside, in instances where the failure or cessation of the business would have an adverse impact on the local area. This information will be used to assess the future sustainability / viability of the proposal, particularly where new buildings are being proposed as part of the development.

7.8.2. The scope of the information required by the Council will be dependent on the scale and nature of the proposal. However, the Council will require applicants to show that the business is financially sound and is expected to be economically sustainable / viable in the future (usually projections for the following 3-5 years will be required).

7.9. Staff Accommodation

- 7.9.1. Where proposals include the provision of permanent on site staff accommodation, applicants will be required to provide evidence to satisfy the functional and financial tests for the accommodation. This will be required for proposals relating to existing and new rural tourism / leisure proposals. The type of information required will include a description of those aspects of the operation and management of the proposal that requires a permanent on site resident worker, and or changes in the circumstances of an existing business that has given rise to a requirement for permanent on site management. The scale of any staff accommodation will be determined by the requirements of the business enterprise rather than the individual needs of the owner or occupier. Full details are set out in TAN 6 – Planning for Sustainable Rural Communities.
- 7.9.2. As an exception to general planning policies regarding residential development in the countryside, staff accommodation will be restricted via planning conditions in terms of the occupancy of the dwelling to an eligible occupier or person(s) eligible for affordable housing if there are no longer any eligible occupiers.

7.10. Farm Diversification

- 7.10.1. Farm incomes have been significantly reduced in recent years and in order to help sustain the core farm business, many farmers have sought new ways to generate additional farm income in order to support the mainstream agricultural activities. Farm diversification can generally be described as any proposal that seeks to supplement the income of working farms and such proposals can usually be categorised into tourism, service, sport and recreation and other uses.
- 7.10.2. Not all farm diversification projects will require planning permission as many will merely extend the existing use and activities of the farm. However, generally projects requiring a change of use of land from agriculture to another use or the erection or conversion of buildings for non-agricultural purposes will require planning permission.
- 7.10.3. Many farm diversification proposals such as the conversion of disused buildings for tourism accommodation and the development of sport and recreation projects, will generally be supported by the Council, where they comply with the relevant LDP policies. However, farm diversification proposals can vary greatly in their nature and scale and consequently their impact upon the surrounding environment will differ from one development to another. Therefore, in assessing such proposals for farm diversification it is essential that the natural environment, biodiversity and cultural heritage of the Vale of Glamorgan are protected and where possible enhanced. Proposals which are considered to adversely impact upon these resources will be resisted.

7.11. Low Impact Sustainable Rural Tourism and Leisure Development

7.11.1. In accordance with Policy MD13 (Tourism and Leisure), other than rural enterprise / farm diversification, or the conversion of existing rural buildings, proposals for new or enhanced tourism or leisure developments in the countryside (i.e. outside defined settlement boundaries) will only be permitted if they are regarded as sustainable low impact tourism development. This section sets out what the Council expects from such developments.

7.11.2. ~~One of the key priorities in PPW for rural areas is “to secure a thriving and diverse local economy where agriculture related activities are complemented by sustainable tourism” (paragraph 4.6.3 of PPW refers).~~ **PPW emphasises that tourism development “needs careful management to ensure continued enjoyment by future generations” (p.74 of PPW refers).** The LDP therefore seeks to support proposals for sustainable forms of rural tourism and leisure development, but this must be balanced with other environmental and amenity considerations. Policies SP11 (Tourism and Leisure) and MD 13 (Tourism and Leisure) favour the provision of new or enhanced sustainable tourism and leisure facilities in the countryside, particularly low impact developments which have a minimal impact on the landscape and heritage features of the rural Vale of Glamorgan.

7.11.3. Sustainable tourism is defined in the European Charter for Sustainable Tourism as *“any form of development, management or tourist activity which ensures the long term protection and preservation of natural, cultural and social resources and contributes in a positive and equitable manner to the economic development and well-being of individuals living, working or staying in protected areas.”* Typically, sustainable low impact tourism and leisure proposals will exhibit the following attributes:

- Are sensitively located and designed to minimise their impact on water, soil and existing landscape features;
- Utilise sustainable sources of water and energy, and provide servicing without significant modifications to existing infrastructure;
- Are of an appropriate scale sympathetic to their location and surrounding uses;
- Are compatible with surrounding land uses, and do not detract from existing agricultural activities where applicable;
- Utilise existing road infrastructure without the need for highway improvements or avoid causing adverse effects on the existing highway network;
- Are accessible to sustainable modes of transport e.g. train, bus, cycle tracks and walking routes;
- Require limited supporting infrastructure such as parking;
- Contribute directly to nature conservation objectives;

- Provide opportunities to promote greater understanding and enjoyment of the natural environment and local heritage and
- Generate wider benefits to the local economy.

7.11.4. Examples of low impact tourism development include visitor accommodation in the form of semi-permanent structures such as yurts, tepees or bell tents which can be easily removed and have a minimal impact on the locality. Where a proposal also requires some ancillary infrastructure such as amenity blocks, the preference is for such facilities to be provided in existing rural buildings.

7.11.5. Other forms of low impact tourism and leisure developments include informal outdoor recreational activities such as walking, cycling or coastal sports activities (e.g. surfing and kayaking) or tourism activities using existing or compatible land / vegetation features such as fruit / vegetable picking, tree climbing / rope activities etc. These types of uses are considered to be generally compatible with the character of the rural Vale and are generally welcomed. In recent years, there has also been an increase in the number of low impact pop-up outdoor tourism events such as open-air theatre and music performances across the rural Vale. These types of temporary uses are permitted under the provisions of Part 4 of the GPDO (see section 6) and can help to boost the local tourist trade in the rural Vale.

7.12. Development within the Glamorgan Heritage Coast

7.12.1. The Glamorgan Heritage Coast was designated by the former Countryside Commission in 1972 and covers a 23km stretch of coastline in the Vale of Glamorgan between St. Athan in the east and Ogmore by Sea in the west (See Appendix 2). ~~The purpose of the designation is~~ **The Glamorgan Heritage Coast was designated not only for archaeological and historic environment reasons but also** to ensure that the special environmental qualities of this section of undeveloped coastline are properly managed and protected. This approach is echoed in PPW (Paragraph ~~5.7.4 and 11.1.6~~ **6.5.12** refers) and in the Adopted LDP (Policy MG 27 refers).

7.12.2. Notwithstanding the above, the Council recognises that the Glamorgan Heritage Coast is also an important visitor attraction and that there are existing 'honey pot' locations at Ogmore by Sea, Dunraven Bay, Nash Point and Cwm Colhuw which are important for recreational activity. Accordingly, Policy MG27 (Glamorgan Heritage Coast) allows for development that is essential for informal recreation activities (e.g. footpaths, interpretation centres, equipment hire facilities) and low impact tourism which would not prejudice the intrinsic environmental and heritage qualities of the Glamorgan Heritage Coast. Examples of low impact tourism uses could include camp sites, glamping accommodation (such as yurts, teepees, bell tents), pop up open air music events, food and drink festivals and craft fairs which are often seasonal and small scale but can bring significant economic benefits to the local area.

7.13. Ancillary Infrastructure

- 7.13.1. Wherever possible, new tourism facilities / developments should seek in the first instance to utilise existing buildings and structures to accommodate new facilities such as amenity blocks (showers, toilets, kitchen/eating areas etc). Proposals for the conversion of rural buildings to alternative uses will need to comply with LDP Policy MD11 and the Conversion and Renovation of Rural Buildings SPG together with other relevant policies / SPGs such as those relating to access arrangements and parking provision, impacts on protected habitats or species etc.
- 7.13.2. Any new supporting infrastructure should be minimal and essential to the operation of the proposal. Where new ancillary infrastructure is required, careful consideration should be given to the siting, scale and design of any facility to ensure that landscape, environmental and visual impacts are minimised. Other supporting infrastructure such as access roads or tracks, car parking, drainage equipment and facilities, electricity and water supplies should also be sensitively integrated into the landscape. Supplementary features such as fire pits, BBQ areas etc. should be incorporated within the overall scheme design and should be shown on site layout plans submitted with a planning application. The Council encourages the sustainable use of and management of natural resources such as rain water recycling and renewable energy uses which can assist in minimising the extent of new on site infrastructure.

7.14. Advertising

- 7.14.1. When considering the use of advertising or signage, care should be taken to ensure that they are designed and sited to avoid creating an adverse impact on their surroundings and that a proliferation of individually acceptable signs does not spoil the appearance of the countryside.

7.15. Security

- 7.15.1. **It is important that any new buildings are designed to be safe and secure, this is particularly important in many tourist locations as they may be in isolated or vulnerable locations where they are not always well over looked. As well as considering designing out crime consideration should be given as to how to develop activities which would increase legitimate use of areas for tourism and recreational purposes and how this may increase the levels of surveillance and capable guardianship. Advice can be obtained from Police Design Out Crime Officer or from Secured by Design (SBD).**

8. Safeguarding Existing Tourism and Leisure Facilities

- 8.1. Tourism and Leisure facilities are those places that attract residents or visitors to the area for recreational purposes and may include hotels or tourist accommodation, museums, indoor or outdoor sport venues, outdoor pursuits, riding schools, farm and country parks, theme parks and event / exhibition space. However, this list is not exhaustive and there are many other facilities which could fall within this definition.
- 8.2. In both urban and rural areas, tourism-related development is an essential element in providing for a healthy, diverse, local and national economy. Furthermore, it can contribute to the provision and maintenance of leisure facilities for local communities. In view of this, the LDP seeks to enhance existing tourism and leisure facilities and resist proposals which would result in their loss. Where a proposal involves the loss of an existing tourism or leisure facility, Policy MD13 (Tourism and Leisure) requires applicants to demonstrate that there is either a lack of market demand or that the business is not financially viable. This should be provided in the form of a marketing statement and include the following information:
- Independent valuation;
 - Sales marketing materials and responses;
 - Accounts;
 - Occupancy and achieved room rate data (where applicable);
 - Business plans;
 - Marketing Plan, schedule and brochures;
 - Investment schedule and plans;
 - Details of plans to up-grade/re-position with full costing.
- 8.3. Appropriate marketing should be undertaken for a reasonable period of time before a planning application for a change to use or redevelopment of an existing tourism / leisure facility is considered. The Council considers that a period of 12 months is an appropriate period, and applicants are advised to submit their planning application within 3 months of completing the marketing exercise to avoid outdated evidence.

9. Further information and Advice

- 9.1. Further advice on all aspects of this guidance can be sought from the Planning Department. Prior to the formal submission of a planning application, the Council encourages applicants to utilise the Council's pre-application services which can save unnecessary work, costs and delay through negotiation. Further information on the Council's pre-application advice services can be found on the Council's website www.valeofglamorgan.gov.uk

Development Management

Dock Office
Barry Docks
Barry
CF63 4RT
Tel: 01446 704681
Email: planning@valeofglamorgan.gov.uk

- 9.2. Proposals for tourism and leisure related development proposals may also benefit from contact with the Council's Tourism team and / or the Creative Rural Communities team who work with communities and enterprises to develop innovative projects and ideas that create long term social and economic benefits within the rural Vale.

9.3.

Tourism Team

Tourism Office
Barry Island Tourist Information Centre
The Promenade
The Triangle
Barry
CF62 5TQ
Tel: 01446 704867
Email: tourism@valeofglamorgan.gov.uk

Creative Rural Communities

Cowbridge Old Hall
Cowbridge
CF71 7AH
Tel: 01446 704750
Email: create@valeofglamorgan.gov.uk

Designing out Crime Officer

South Wales Police

Territorial Policing Hub

South Wales Police Headquarters

Tel: 01656 655555 Ext: 29251

Jon.Brown@south-wales.pnn.police.uk

10. Appendices

10.1. Appendix 1 – Vale of Glamorgan STEAM Tourism Survey 2016 Results Summary



STEAM SUMMARY 2016 VALE OF GLAMORGAN COUNCIL

Total economic impact of tourism £M	221.60
% change on 2015 (£'s 2016)	-0.5%

Total visitor days (Millions)	5.40
% change on 2015	0.0%

Staying visitor days (Millions)	2.02
% change on 2015	-0.8%

Total visitor numbers (Millions)	3.97
% change on 2015	0.2%

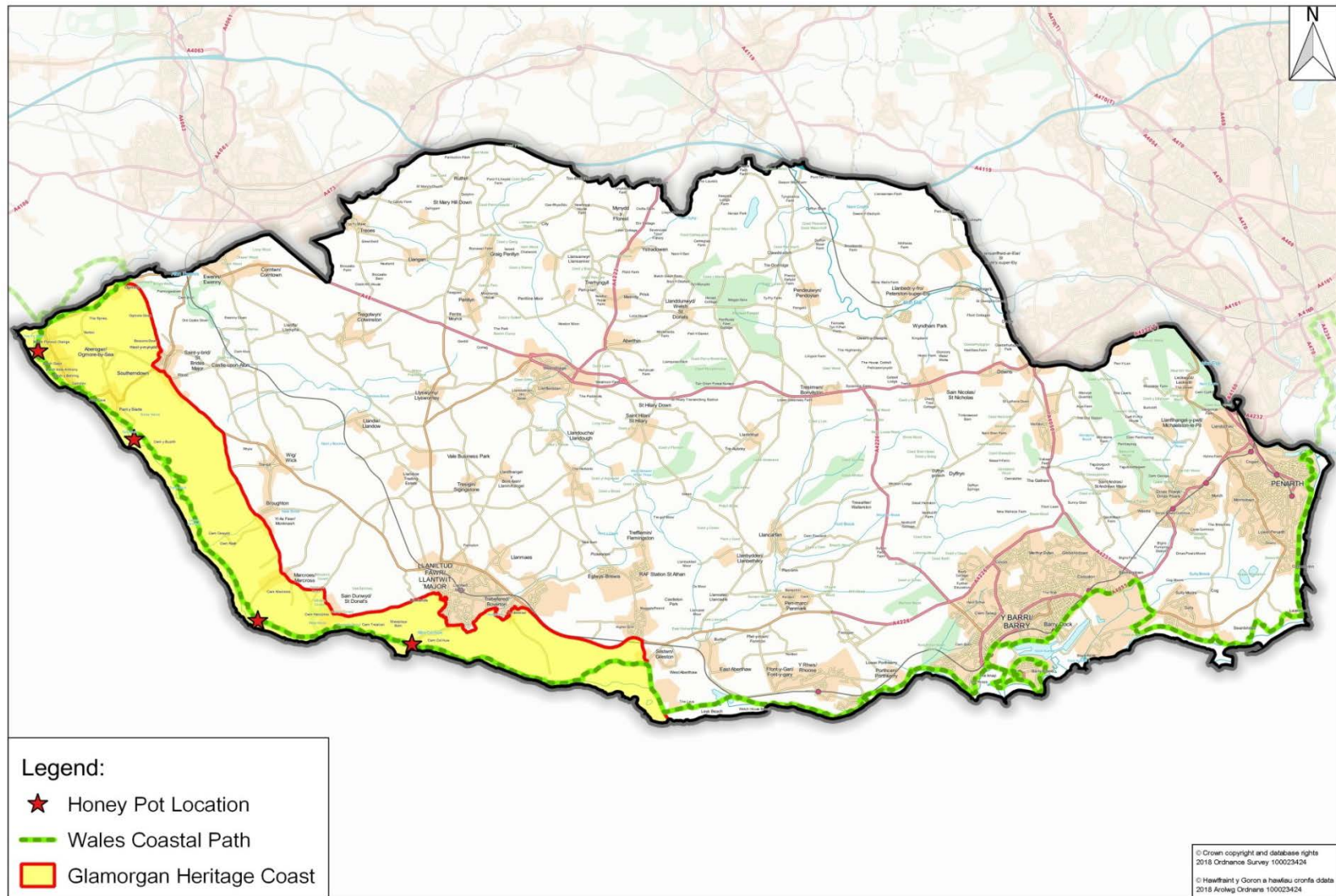
Number of staying visitors (Millions)	0.59
% change on 2015	-1.3%

Number of day visitors (Millions)	3.38
% change on 2015	0.5%

Number of FTE jobs supported by tourism spend	2,946
% change on 2015	0.0%

Prepared by Cathy James, GTS (UK) Ltd

10.2. Appendix 2: Map Showing the Wales Coastal Path, Glamorgan Heritage Coast and Honey Pot Locations



10.3. Appendix 3: Examples of Tourism and Leisure Developments in the Vale of Glamorgan



Site Name: West Farm, Southerndown | **Planning App. Ref: 2009/01364/FUL**

Development: Change of use from tea shop restaurant to mixed use restaurant, cinema plays, meeting facilities, exhibitions and holiday accommodation

This application was for a change of use of an existing former barn from a tea room / restaurant to a mix of uses including a tea room/restaurant, cinema/play facility, meeting room and exhibition space, with a separate unit for holiday let accommodation. The mix of ‘function’ uses were accommodated within the ground floor of the building and the left hand side of the first floor, with the holiday let unit located adjacent on the right hand side of the first floor. The holiday let had a lounge area, bathroom and two bedrooms.

The proposed mix of commercial facilities were not readily available elsewhere in such close proximity to the neighbouring rural villages, and it was considered that the application represented a beneficial form of use that would have a positive impact upon tourism in the local area and the wider rural economy. It also satisfied local and national planning policy, in respect of assisting the creation of sustainable communities by providing residents with a range of local services close to their homes.

Similarly, the proposed holiday let unit represented a tourism facility that would assist the rural economy and could either function as a let-able unit in its own right or as well placed ancillary accommodation to customers using the other commercial facilities within the building. There was a clear synergy between the two units and it was considered that the holiday let would positively support the attractiveness of the tea room/restaurant/function room.

In this case the development did not involve any external alterations to the building or the creation of any enlarged parking areas or curtilage. Therefore, the change of use did not adversely affect the character of the building or the special environmental qualities of the Glamorgan Heritage Coast.

Due to its rural location it was considered that a degree of parking was required to support the mixed use functions on site as some visitors would be arriving by car. However the site already benefitted from a parking area which was able to serve the proposed development.



Interior
of
Cabans

Glamping Lodges

Site Name: Tresilian Wood, St Donats

Planning App. Ref: 2014/01441/FUL

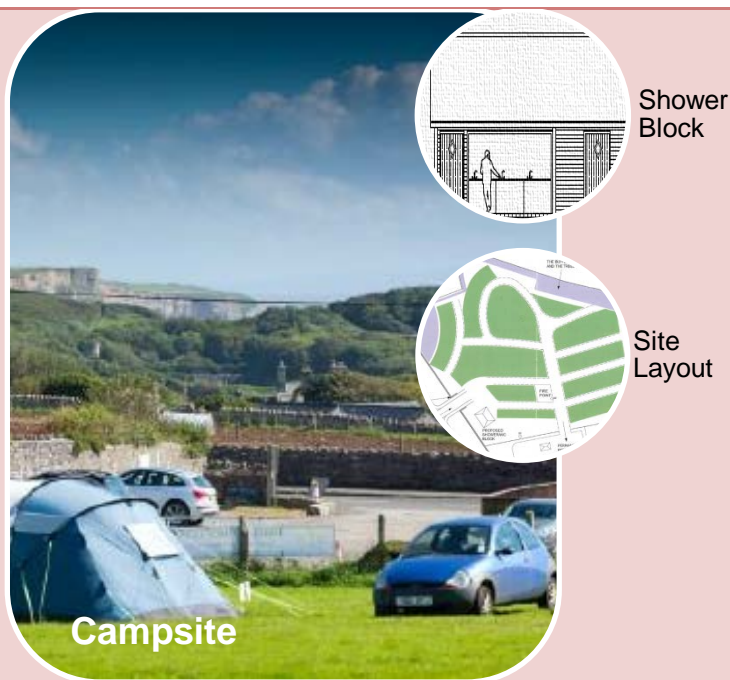
Development: Proposed five holiday lodges and upgrade of campsite to include extension of existing reception building to provide five star facilities and two WC and shower units.

This application was for a change of use of the site to a campsite. The proposal included 5 holiday lodges; six 'Cabans' and a campsite area as well as two new toilet and shower blocks and an extension to the existing reception and shower/toilet building. The extended building also included provision for a moderate sized workshop and storage area for the 'Cabans' when not in use.

The 'Cabans' are temporary structures that can be erected within a few hours. They are of a timber construction with a metal frame in an Octagon Shape. The lodge buildings are slightly larger than the 'Cabans' but were purpose built to maximise the minimal floor space and provide self-sufficient accommodation. The lodges are of wooden construction supported on posts standing on 11 circular concrete pads, which were excavated by hand for each location.

While the proposal was for wooden lodges and 'Cabans', as opposed to caravans and chalets, they are very similar in nature and principle to those forms of accommodation which are usually seen on campsites. PPW stresses the importance of tourism in assisting the local economy and specifically states that in rural areas, tourism-related developments are an essential element in providing for a healthy, diverse, local and national economy. It states that they can contribute to the provision and maintenance of facilities for local communities but acknowledges that development should be sympathetic in nature and scale to the local environment and to the needs of visitors and the local community. Given the importance of developing the rural tourism economy in the Vale, it is imperative to encourage uses such as this proposal in appropriate locations. In this context the proposed development represented the type of development promoted by PPW, which would provide benefits to the rural economy and assist the aims of strategic policy in the LDP.

The proposal did affect a number of trees which had to be removed for the siting of the lodges, however, this was clearly considered in an arboriculturist report provided with the application. Specifically in this case, the trees that were felled in order to accommodate the lodges and parking area were small or failing trees, which would not result in a wider impact on the existing visual amenity at the site.



Site Name: Three Golden Cups Campsite, Southerndown

Planning App. Ref: 2013/00552/FUL

Development: Change of use from agricultural land to campsite

The proposed development on land to the rear of the Three Golden Cups Public House sought to gain planning permission for a campsite for 40 pitches, a permanent shower block, and a new vehicular access to the proposed campsite. The application sought to diversify the business and make the most use of the land relating to the public house. The application was submitted following a trial project organised by the Council's Creative Rural Communities Team, which identified six sites within the Glamorgan Heritage Coast which would benefit from a campsite to promote tourism within the local area.

As the Glamorgan Heritage Coast is considered a crucial asset in promoting the Vale of Glamorgan as a tourist destination it was deemed that the proposed use should be located in an area which maximises the contribution the Glamorgan Heritage Coast makes to the rural tourism economy while preserving its overall character and appearance. Therefore, the proposal was assessed upon its visual impact, the impact upon neighbouring amenity, highway safety and the potential tourism benefits.

The visual impact of the proposal was alleviated due to the position of the site in a well screened area which limited public views into the proposed campsite. The topography of the site, existing buildings, boundary wall, the low level nature of the development and the sensitive design of the shower block all contributed to minimising the visual impact of the proposal. Furthermore, the development was situated within close proximity to the built form of Southerndown which was considered to be a logical position for the campsite due to its closeness to existing access routes to the nearby beach. The applicant submitted a Campsite Rules and Management Structure setting out how the site would be run and included buffer areas between pitches and the neighbouring properties to ensure residential amenity was protected.

The campsite was considered to actively support the aims of the Council's Rural Local Development Strategy by encouraging and improving access to the rural Vale, and strengthening the stock of tourist accommodation available to visitors. Therefore it was considered that the proposal would represent a significant benefit to the local and Vale wide tourism economy. Overall, the proposal was granted permission as it was considered to be a form of low impact tourism and would benefit the rural tourism economy, especially the Glamorgan Heritage Coast.



Sensitive Design Materials



Built in the landscape

Site Name: Pen Y Bont Surf Lifesaver Centre, Ogmore by Sea

Planning App. Ref: 2012/00464/FUL

Development: Demolition of existing Surf Lifesavers Centre and replacement with a new Surf Life Savers Centre

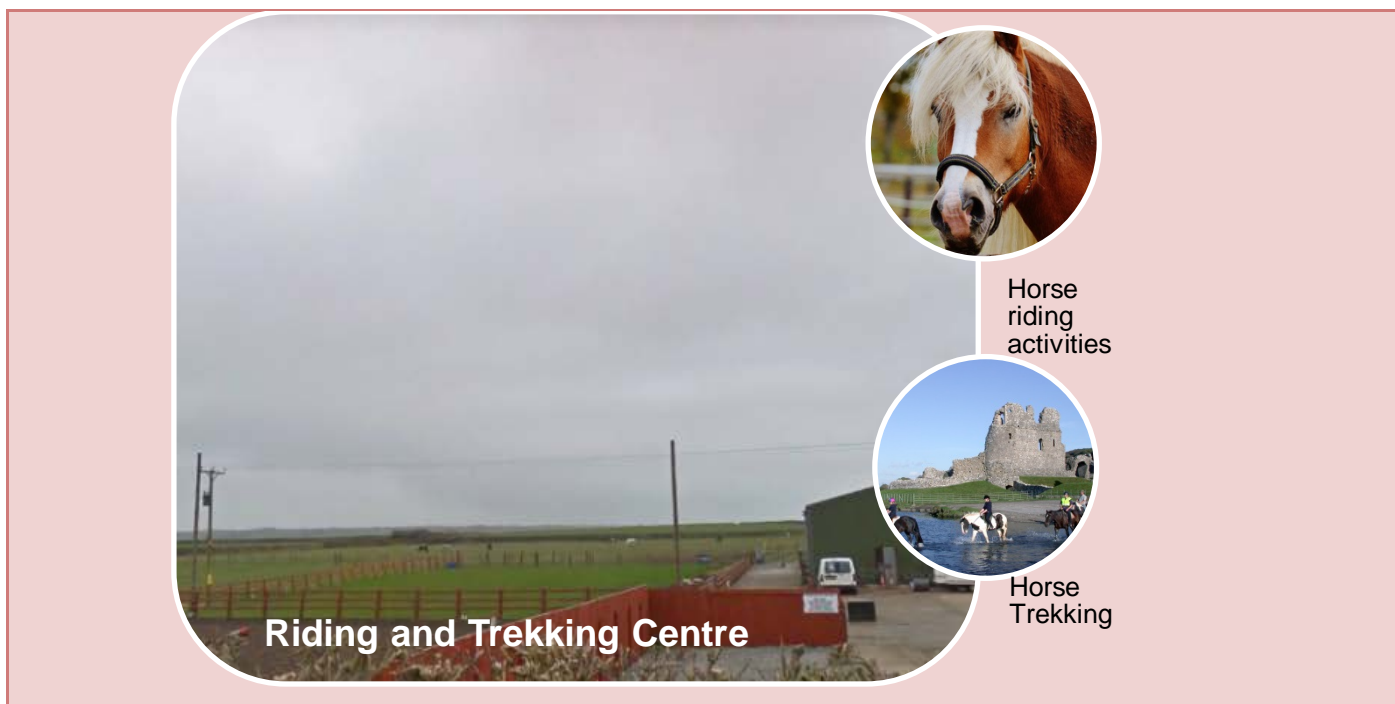
The application was to demolish and replace the existing Surf Lifesavers Centre with a new life guard centre. The proposed building would provide a multi-purpose facility which would be shared by the Local Community, Police, Coastguard, RNLI sections of Surf Life Saving Wales and provide a suitable/functional building for the education of young lifeguards and visitors.

It was recognised that the existing building was no longer “fit for purpose” and that any remedial works to maintain the building or extend it would not be economically viable. Moreover, it was recognised that a new purpose built building would accommodate the necessary storage needs of the club and by re-siting the building it would facilitate direct access onto the new slipway access to the beach.

As the building would be clearly visible from a number of public viewpoints and from within the Glamorgan Heritage Coast, the siting, design and overall appearance of the building needed to be given detailed consideration in relation to its immediate and wider context. In terms of design, the massing, form and proposed detailing of the building reflected the maritime nature of the building and the fact that the location of the building is very exposed to the elements of the sea and weather. It was recognised that the roof form would be the most prominent and therefore visible part of the building. However the “double curved” roof reduces the eaves height to the rear elevation and ‘softens’ the appearance of the gable ends. In relation to the material finishes, the use of dressed local stone, was considered acceptable, in that it reflects the materials found in the locality.

The general approach to landscaping in this application was to maintain the character of the existing natural landscaping. The proposed grassed sand bunds introduced around the car parking areas, were not intended to screen the development but to act as a natural transition between the building and the undulating natural habitat of the sand dune grassland.

Through these specific design solutions the proposal was considered an appropriate form of development and was granted planning permission.



Site Name: Land Opposite Court Newydd Farm, St. Brides Major **Planning App. Ref: 2009/01118/FUL**

Development: Change of use of land and barn to riding and trekking centre

The application proposed the regularisation of a change of use of the land to a riding school and trekking centre. The applicant’s supporting statement indicated the land had been used informally for horse riding lessons since 1989, but more formally as a riding and trekking centre since 1999. The proposal related to the use of the existing manege, barn, paddock and parking area and did not involve any new operational development.

Although the proposal did not involve any additional operational development beyond that which had already been approved under previous planning applications it nevertheless remains the case that a commercial proposal of this nature could result in a more intensive use than a domestic horse related development, with a greater visual impact from associated trappings, additional vehicle movements etc.

However, in this case, it was not considered that the proposed use would unacceptably impact upon the character of the area. The riding school has operated for a number of years without the use of visually intrusive signage or other associated commercial trappings, and the use of the parking area is generally limited given the relative infrequency of its use throughout the week and the staggering of visitors on weekends.

In terms of the adopted LDP, proposals of this nature would typically be considered under policies SP11 - Tourism and Leisure, MG29 - Tourism and Leisure Facilities and MD13 -Tourism and Leisure. Considerations may also be given to Policy MD17 Rural Enterprise where the proposed development relates to an existing agricultural use which wishes to diversify its operations.



Temporary structures



Range of Outdoor Adventure Activities

Paintballing Area

Site Name: Beech Clump, Cowbridge

Planning App. Ref: 1991/00406/FUL

Development: Change of use for adventure training games / paintballing park

Although the development was under a different planning policy framework it has continued to be a successful business and a good example of low impact tourism in the Rural Vale.

The development related to a woodland area on a southward facing hillside bordered by agricultural meadowland. The woodland area formed part of an attractive landscape in the rural area and bordered the Thaw Valley which was designated as an area of High Landscape Importance in the draft Rural Vale Local Plan at the time. However, the proposed development was situated away from the most high value trees on site which were protected by a Tree Preservation Order (TPO) to ensure that the quality and amenity value of the TPO was maintained.

The proposal mainly used temporary structures throughout the development to create barricades and obstacles for the paintballing activity proposed. Although a wooden castle like permanent structure was proposed, it was reasonably small scale and well screened by the surrounding woodland which limited its visibility within the surrounding landscape.

A number of planning conditions were imposed on the development to ensure that the proposal respected its sensitive setting such as, no overnight camping, additional works to trees requiring written consent to the Local Planning Authority, limiting the time activities could be undertaken on the site to between 10:00am and 7:00pm and limiting the amount of people who could attend the site at any one time to ensure there was no detrimental impact upon local amenity.

Although planning policy has changed considerably since this development was approved the main considerations relating to the impact upon the setting and local amenity would still be relevant under policies in the adopted LDP (e.g. policies SP11 Tourism and Leisure, MG17 - Special landscape Areas, MD1 - Location of New Development, MD2 - Design of New Development, MD13 - Tourism and Leisure and MD17 - Rural Enterprise).



Civil Marriages & Weddings



Minimal changes to existing barns



Low impact setting

Site Name: Cosmeston Medieval Village

Planning App. Ref: 2016/01330/REG3

Development: Change of use of two barn buildings, forming part of Cosmeston Medieval Village, to allow civil marriages and wedding events

This application was for a change of use of two of the medieval barns situated within Cosmeston Medieval Village / Country Park (known as Tithe Barn and Reeve's Barn) to allow for civil marriage proceedings.

The proposed development indicated that although the two barns would be licensed to hold ceremonies, only one civil marriage event would take place at any one time. Therefore it was anticipated that the site would host approximately 10 no. civil ceremonies per year. Although the venue would be available for use 7 days a week, it was anticipated that the majority of civil marriage events would take place between Friday and Sunday, between 9am and 5pm, with none being held on bank holidays. The application stated that the organisation of any civil marriage events would be managed by Countryside Services staff, with appropriate licences in place and relevant terms and conditions imposed to control noise, parking etc.

It was considered that the limited use of the barns for civil marriages would both complement and enhance the existing facilities which were being used as a heritage facility. It was also deemed that the proposed use would help maintain the future viability of the country park, thereby serving to safeguard an existing recreational facility.

The proposal did not include any works to the existing barns or any additional on-site parking. However the proposal did include some new works to an existing access to enable emergency and disabled access to the venue and servicing as required. Such works represented new development within the rural landscape but were considered relatively minor when compared with the wider scale of the Country Park and its overall facilities. As such it was concluded that the proposal would have no adverse impact on the character and appearance of the immediate area or the wider undeveloped areas of the country park.

The potential increase in traffic from the proposed use was considered against the existing access arrangements and traffic flow to and from the site associated with its current use as a country park. On balance, it was determined that the increased use of the site for civil marriages and wedding events would not significantly affect the residential amenity of nearby residential properties.



The Vale of Glamorgan Council
**Directorate of Regeneration and
Planning**
Dock Office
Barry Docks
Barry Cf63 4RT

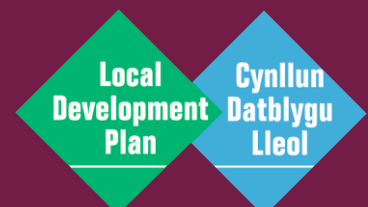
LDP@valeofglamorgan.gov.uk
www.valeofglamorgan.gov.uk

Renewable Energy



Supplementary Planning Guidance

March 2019



Renewable Energy ~~Draft~~ Supplementary Planning Guidance

***This document is available in other formats upon request e.g.
larger font. Please see contact details in Section 9.***

Contents

1. Introduction	1
2. Status of the Supplementary Planning Guidance	2
3. Purpose of the Supplementary Planning Guidance	3
4. Legislative and Policy Context	4
5. Household and Small Scale Renewable Energy Developments.....	11
6. Types of Large Scale Renewable Energy Developments in the Vale of Glamorgan.....	19
7. Planning Considerations for Large Scale Renewable Energy Developments	26
8. Further Information and Contacts.....	37
9. Further Guidance and Information	38
10. Appendices	41
10.1. Appendix 1: Planning Application Requirements for Renewable Energy Proposals	41
10.2. Appendix 2 - Map of European Designated Sites	44
10.3. Appendix 3 - Existing and Proposed Low and Zero Carbon Energy Schemes...	45
10.4. Appendix 4 - Wind Energy Resource.....	46
10.5. Appendix 5 - Wood Fuel and Energy Crops Resource for Heat and Power Generation	48
10.6. Appendix 6 - Heat Opportunities Mapping	49
10.7. Appendix 7 - Assessing Solar Photovoltaic (PV) Farm Resource	51
10.8. Appendix 8: Landscape and Visual Information required for Wind Turbines	52

1. Introduction

- 1.1. The Welsh Government has committed to undertaking a whole system transition to low carbon energy to revolutionise the way Wales will meet and manage its energy needs. As such the adopted development plan has a number of enabling policies to meet the Welsh Government's aim through the promotion of renewable energy.
- 1.2. Renewable energy is defined as energy from a source which is either unlimited or which can be renewed without harming the environment. This also includes low carbon energy which is energy derived from non-renewable sources but the design of the system produces far less carbon emissions than contemporary methods.
- 1.3. Some renewable energy development can be undertaken without the need for permission from the Council such as certain types of Micro-generation. Permitted development rights remove the need to obtain planning permission for a range of micro-generation technologies for both domestic and commercial properties as long as they meet certain criteria set out within the General Permitted Development Order. However, if permission is required for the development, applicants must submit either a householder or full application depending on the size and nature of the development.
- 1.4. When submitting a planning application for renewable energy projects applicants need to be aware of the process, design and quality of the proposed development to help identify landscapes which are best suited to accommodate renewable technologies while maintaining the other aspirations of the development plan such as conserving and enhancing natural heritage.
- 1.5. This guidance relates to planning applications for renewable forms of energy up to 10MW. For developments over this threshold different consenting regimes apply outside of the Council's scope, depending on the type of renewable technology. **From the 1st April 2019** ~~For~~ renewable technologies between 10-**350MW**¹ the Welsh Government are the deciding authority under the Development of National Significance (DNS) consenting regime **with the exception of onshore wind projects which currently have no upper limit.** Whereas developments which would produce over **350MW** are decided upon by central government through the Nationally Significant Infrastructure Projects (NSIPs) consent regime.

¹ **The Developments of National Significance (Specified Criteria, Fees and Fees for Deemed Applications) (Wales) (Amendment) Regulations 2019 - <http://www.legislation.gov.uk/wsi/2019/283/made>**

2. Status of the Supplementary Planning Guidance

~~2.1. This draft guidance was approved for public consultation on the XXXX. The Council will take account of comments received during the consultation exercise before finalising the document for publication. Once adopted, this guidance will be a material consideration in relevant planning decisions and appeals.~~

~~2.2. Planning Policy Wales (PPW) advises that SPG may be taken into account as a material consideration where it has been prepared in consultation with the general public and interested parties and it has been the subject of a Council resolution.~~

- 2.1. **Draft guidance was approved for public consultation purposes by Cabinet on 3rd December 2018 (minute no. C502 refers). A six week public consultation was subsequently held between 4th January 2019 and 15th February 2019. The relevant documentation was made available for viewing at the Council's main offices and on the web site during the consultation period.**
- 2.2. **The Council considered the representations received and made changes where appropriate. This SPG was approved by Cabinet on the XXXX 2019 (minute no. XXXX refers) and will be a material consideration in the determination of relevant planning applications and appeals.**

3. Purpose of the Supplementary Planning Guidance

- 3.1. This Supplementary Planning Guidance (SPG) has been produced to support and add detail to the Vale of Glamorgan Local Development Plan (LDP) 2011-2026. It is intended to provide clear and precise guidance to assist homeowners, land owners, developers and other interested parties involved in the planning process on how to fully consider renewable energy in development proposals.
- 3.2. This SPG represents a material consideration in the determination of planning applications and appeals and will be used to assist officers and Council members in determining planning applications. For applicants seeking to obtain permission for development relating to renewable energy it is important to take this guidance into account when designing the proposal to increase the likelihood of obtaining planning permission.
- 3.3. The purpose of this document is to provide advice to assist and guide applicants in designing their proposals for renewable development and help case officers and members make informed decisions on applications relating to renewable energy. Furthermore, the guidance seeks to ensure the benefits of renewable energy development are balanced against economic, social and amenity impacts on communities as well as the environmental impacts which include biodiversity and preserving the visual landscape.
- 3.4. Furthermore the SPG builds upon LDP policies and identifies areas within the Vale of Glamorgan which have a higher potential to accommodate renewable energy development. This is based on assessments of the potential for renewable and low carbon energy generation using Welsh Governments practice guidance “Planning for Renewable and Low Carbon Energy – A Toolkit for Planners” (2015). The SPG includes the updated maps which are the result of the Renewable Energy Assessment (REA) undertaken in 2018 which updates the findings from the 2016 REA in support of the LDP to account for factual changes in the source data. This will ensure renewable energy developments are promoted through the planning system as the updated maps will aid developers in locating the most suitable locations within the Vale of Glamorgan for renewable technologies.
- 3.5. The SPG looks in detail at the 3 main renewable energy sources within the Vale of Glamorgan and undertakes a broad level study identifying areas which have the potential to support future development for renewable and low carbon energy production for:
 - Wind Energy
 - Solar Energy
 - Biomass

4. Legislative and Policy Context

4.1. Relevant Legislation

- 4.1.1. The **Planning (Wales) Act 2015** - seeks to deliver a planning system which is fair, resilient, enables development and helps create sustainable places.
- 4.1.2. The **Well-Being of Future Generations (Wales) Act 2015** - seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act contains seven well-being goals which local authorities as well as other public bodies must seek to achieve in order to improve well-being both now and in the future. It means that for the first time, public bodies listed in the Act must do what they do in a sustainable way and make sure that when making their decisions they take into account the impact they could have on people living their lives in Wales in the future.
- 4.1.3. The **Climate Change and Sustainable Energy Act (2006)** makes provisions for the reduction of greenhouse gases, the alleviation of fuel poverty, the promotion of micro generation and the use of heat produced from renewable sources. The Act seeks to enhance the UK's contribution to combating climate change through the promotion of renewable energy sources which generate >50kW of electricity or produce >45kW thermal energy.
- 4.1.4. The need to reduce greenhouse gases is further emphasised in Wales through the **Environment (Wales) Act (2016)**. The Act seeks to position Wales as a low carbon, green economy which is ready to adapt to climate change. Part 2 of the Act gives Welsh Government powers to place statutory emission reduction targets in relation to Climate Change; the Act includes an 80% reduction target for emissions by 2050. Renewable Energy generation will play a key role within Wales in achieving this target and ensuring the progress of decarbonisation.
- 4.1.5. The **Planning and Energy Act (2008)** enables Local Planning Authorities (LPAs) to set requirements for energy use and efficiency in their LDPs. This includes local policies which impose requirements relating to the proportion of energy used in development that is obtained from renewable sources or low carbon energy sources within the locality of the development. Furthermore, it allows LPAs to set policies for developments to comply with energy efficiency standards which exceed the energy requirements of building regulations.
- 4.1.6. The primary legislation relating to renewable energy is contained within the **Energy Act (2016)** and the previous enactments of the legislation which are still in force. The Act makes provision for the development, regulation and encouragement of renewable energy sources in the UK. The most recent version of the Act gained royal ascent in 2016 and transferred consent powers for onshore wind farms to LPAs.

- 4.1.7. The **EU Renewable Energy Directive (2009)** sets out the legally binding target of achieving 15% of overall energy demand from renewable sources by 2020.

4.2. National Policy

- 4.2.1. The **Renewable Energy Strategy (2009)** sets out how the UK will increase the use of renewable electricity, heat and transport to meet the 15% EU target and address the challenges of climate change and the national security of energy supply.
- 4.2.2. Wales has also produced a **Climate Change Strategy for Wales (2010)** to aid in the reduction of greenhouse gas emissions. The strategy includes a specific action “*to ensure that land use and spatial planning promote sustainable development and enable a move towards a low carbon economy which takes account of future climate impacts*”; one of the key areas which underpin these actions is energy generation.
- 4.2.3. **Planning Policy Wales (PPW) Edition 109 (2018)** sets out the land use planning policies of the Welsh Government. Chapter 54 of PPW **Productive and Enterprising Places** ~~Planning for Sustainability~~ states as part of Welsh Government’s aim to promote sustainability through the planning system, “**The benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change and increase energy security, is of paramount importance.** ~~tackling climate change is a fundamental part of delivering sustainable development~~” (PPW, para.5.78, 2018). In reference to the need for renewable energies PPW states:

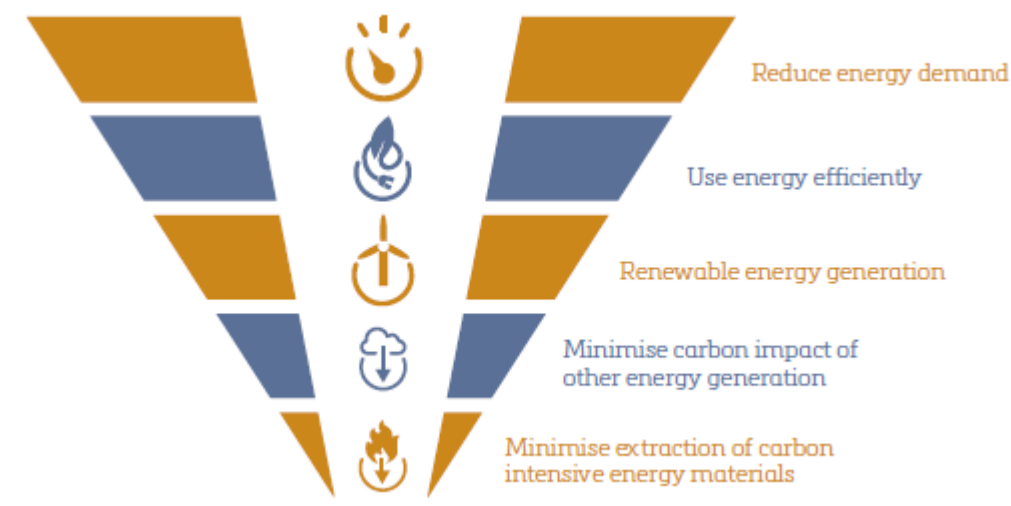
“Climate change is a global challenge, with impacts felt at the local level presenting a significant risk to people, property, infrastructure and natural resources. We need to plan for these impacts, reducing the vulnerability of our natural resources and build an environment which can adapt to climate change. Planning to minimise the cause of climate change means taking decisive action to move towards a low carbon economy by proactively reducing the demand for energy, facilitating the delivery of now and more sustainable forms of energy provision at all scales and minimising the emissions of greenhouse gases to the atmosphere” (PPW, para.5.73, 2018).

- 4.2.4. PPW Chapter 12 ~~Infrastructure and Services~~ expands further on the need to promote renewable and low carbon energy but ~~notes~~, the delivery mechanisms for ~~most~~ **some** of ~~our~~ **the** energy aspirations **of the Welsh Government** are currently outside the control of the Welsh planning system. The key areas of responsibility **for Local Planning Authorities in Wales are onshore renewable energy schemes which generate 10MW or less. In regards to larger renewable energy schemes PPW states “Planning applications for onshore generating projects in Wales which have an installed generation capacity of between 10MW and 50MW (there is no upper limit for onshore wind generating stations) are made directly to the Welsh Ministers under**

the Developments of National Significance (DNS) process” (PPW, para.5.76, 2018). ~~the Welsh planning system “is onshore development less than 50MW”. For the purposes of planning the following scales are outlined in PPW in relation to renewable energy developments:~~

- 4.2.5. **To ensure development mitigates the causes of climate change the Welsh Government recognises an energy hierarchy, detailed in Figure 1 below, which development proposals are expected to follow.**

Figure 1: Energy Hierarchy (Source: PPW)



- 4.2.6. PPW **section 5.9 Renewable and Low Carbon Energy** states the planning system should be used to optimise renewable energy generation, optimise low carbon energy generation, facilitate combined heat and power systems (and combined cooling, heat and power) where feasible and recognise that the benefits of renewable energy are part of the overall commitment to tackle climate change by reducing greenhouse gas emissions as well as increasing energy security. However, these objectives need to be viewed alongside obligations to protect designated areas, species and habitats as well as the historic environment; ensuring mitigation measures are used to offset potential detrimental effects on local communities whilst ensuring the potential impact on economic viability is given full consideration and; encourage the optimisation of renewable and low carbon energy in new development to facilitate the move towards zero carbon buildings.
- 4.2.7. In regards to development management considerations, PPW states that in the determination of applications relating to renewable energy and low carbon energy development, local planning authorities should take account of:
- **“the contribution a proposal will make to meeting identified Welsh, UK and European targets;**

~~The contribution a proposal will play in meeting identified national, UK and European targets and potential for renewable energy, including the contribution to cutting greenhouse gas emissions;~~

- **the contribution to cutting greenhouse gas emissions;**
~~The wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development;~~
- **the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development” (PPW, para.5.9.17, 2018).**
~~The impact on the natural heritage, the Coast and the Historic Environment;~~

4.2.8. **Furthermore, Local Planning Authorities should require renewable energy schemes to avoid, mitigate or compensate adverse impacts these type of development proposal can have on an area. The construction, operation, decommissioning, remediation and aftercare of development proposals should take account of:**

- **“the need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations;**
- **the impact on the natural and historic environment;**
- **cumulative impact;**
- **the capacity of, and effects on the transportation network;**
- **grid connection issues where renewable (electricity) energy developments are proposed; and**
- **the impacts of climate change on the location, design, build and operation of renewable and low carbon energy development. In doing so, consider whether measures to adapt to climate change impacts give rise to additional impacts.” (PPW, para.5.9.18, 2018)**

~~• The need to minimise impacts on local communities to safeguard quality of life for existing and future generations;~~
~~• Ways to avoid, mitigate or compensate identified adverse impacts;~~
~~• The impacts of climate change on the location, design, build and operation of renewable and low carbon energy development. In doing so consider whether measures to adapt to climate change impacts give rise to additional impacts;~~
~~• Grid connection issues where renewable (electricity) energy developments are proposed; and~~
~~• The capacity of and effects on the transportation network relating to the construction and operation of the proposal.~~

4.2.9. **Technical Advice Note 8 (TAN 8) – Planning for Renewable Energy (2005)** emphasises Welsh Government’s commitment to developing renewable and low carbon energies. TAN 8 states the “*design, infrastructure and site layout are key to achieving energy efficient development by optimising passive solar gain in domestic and non-domestic buildings. The main aspects to consider are the*

orientation of the buildings and the overall site layout, to avoid overshadowing and exposed locations and to optimise sunlight penetration”.

- 4.2.10. In terms of development management TAN 8 stresses the importance of the consideration of renewable energy sources, energy efficiency and conservation measures at the outset of any new development. It further notes the need for:

“Preliminary enquiries and pre-application discussions are also crucial to the success of integrating these elements into any proposed schemes. Local planning authorities should be acquainted with, and have an understanding of the various forms of renewable energy technology currently available and should have access to experts when necessary. It is helpful to be able to discuss options for the inclusion of a range of renewable energy technologies into developments and to direct developers to the variety of sources of advice available to facilitate renewable energy and energy efficiency measures. Developers and local planning authorities should endeavour to enter into discussions with local communities at the earliest possible opportunity when formulating proposals.”

4.3. Local Planning Policy

- 4.3.1. The adopted Vale of Glamorgan Local Development Plan (LDP) sets out the strategic objectives and land management policies for the authority. Strategic **Objective 2** of the LDP seeks to ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effect of climate change. To contribute towards meeting the national renewable energy targets and the strategic objective, the LDP includes monitoring targets to meet 21.19% of projected electricity demand and 1.48% of projected heat demand in the Vale of Glamorgan through renewable sources by the end of the plan period in 2026.
- 4.3.2. **Policy MG30 – Local Search Areas for Solar Energy** identifies 6 broad areas within the Vale of Glamorgan where solar energy generation schemes of up to 50MW will be permitted where there are no unacceptable impacts upon amenity, heritage assets or the environment. The identified areas should only be used as an indication of potential solar resources as the mapping exercise was only based upon the land elevation, orientation and existing key constraints to development. Therefore, further refinement will be needed in relation to the identified areas for detailed development proposals.
- 4.3.3. **Policy MD2 - Design of New Development** sets out the key principles developers should consider to create attractive, safe and accessible environments. Criterion 12 of the Policy states development proposals should *“mitigate the causes of climate change by minimising carbon and other greenhouse gas emissions associated with their design, construction, use and eventual demolition, and include features that provide effective adaption to, and resilience against, the current and predicted future effects of climate change.”* Through implementing this policy the Council hope to encourage energy

conservation and generation from renewable sources to ensure the planning system can make a positive contribution towards reducing the impact of new development on climate change.

- 4.3.4. **Policy MD7 - Environmental Protection** seeks to ensure new development proposals do not lead to unacceptable levels of pollution. The Council will consult with professional bodies such as Natural Resources Wales and the Health and Safety Executive to determine whether a development proposal would lead to unacceptable pollution or exacerbate an existing issue which would lead to planning permission not being granted. To ensure development proposals reduce any impact of pollution the Council encourages developers to assess pollution impacts at the earliest stages of development process. Low carbon producing technologies such as biomass proposals would need to consider the impacts of pollution that could be caused by these types of developments
- 4.3.5. **Policy MD19 – Low Carbon and Renewable Energy Generation** sets out the criteria enabling low carbon and renewable energy development to be permitted. These types of development will be permitted where it can be demonstrated there is no unacceptable impact on the interests of:
- Best and most versatile agricultural land;
 - Aviation safeguarding;
 - Electrical, radio or other communication systems;
 - Landscape importance;
 - Natural and cultural heritage;
 - Nature conservation;
 - Residential amenity; and
 - Soil conservation.
- 4.3.6. However, the cumulative impacts of renewable energy schemes will also be an important consideration.

4.4. Supplementary Planning Guidance

- 4.4.1. The Council has produced a number of Supplementary Planning Guidance (SPG) in support of the LDP. The following SPGs may be relevant to new development proposals relating to renewable energy:
- Residential and Householder Development
 - Biodiversity and Development
 - Design in the Landscape
 - Parking Standards SPG
- 4.4.2. The Council has produced Conservation Area Management Plans (CAAMPs) for the 39 Conservation Areas in the Vale of Glamorgan. These identify the special

attributes and features within these areas that contribute towards their character. The CAAMPs would be particularly relevant to micro generation developments within conservation areas.

5. Household and Small Scale Renewable Energy Developments

- 5.1.1. The Welsh Government acknowledges the scientific evidence which demonstrates climate change is being brought about by human activity. Therefore, it is imperative the planning system is able to promote low carbon and renewable technologies to help cut emissions and encourage the transition to zero carbon in Wales. The Environment (Wales) Act (2016) places a duty on Welsh Ministers to ensure that the net Welsh emissions are lower than 80% than the baseline by 2050. The planning system plays an important role in achieving that target which includes permitted development rights which permit most small scale renewable energy schemes without planning permission. Although the use of renewable energy developments should be promoted, other less direct forms of development can help achieve zero carbon. This can include using electric vehicles (EVs); however, this would require the installation of electric charging points. The Council's Parking Standards SPG contains further information regarding the use of electric charging points in new development proposals and should be consulted when considering proposals for commercial and residential development schemes.
- 5.1.2. ~~Planning Policy Wales defines~~ **Micro generation schemes are defined** as proposals generating electricity or heat below 50kW. In 2012 the Town and Country Planning (General Permitted Development) Order 1995 was amended in Wales, which resulted in many forms of domestic and non-domestic small scale (micro-generation) development benefiting from permitted development rights, meaning they do not usually require planning permission. However, this is subject to specific criteria outlined in Schedule 2 of the Town and Country Planning (General Permitted Development) Order (Wales) 2012 amendment.
- 5.1.3. Householders and small scale developers should be aware of the current types of renewable energy developments which are available to them which can help reduce energy bills and in some cases feed in to the national grid which can be subject to feed in tariffs (FITs) which are payments to ordinary energy users for the renewable electricity they generate. The following pictures show different kinds of renewable and low energy developments which are currently available:



Example 1: Solar PV Panels



Example 2: Solar Roof Tiles



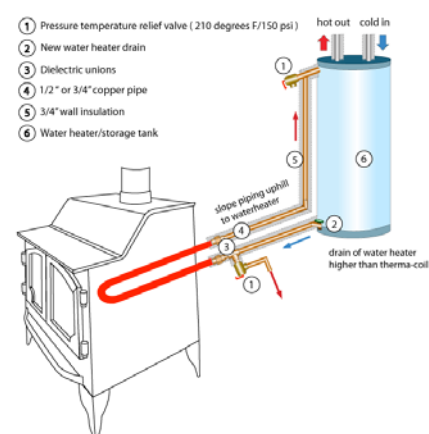
Example 3: Solar Thermal Panels



Example 4: Wall Mounted Turbine



Example 5: Medium Scale Turbine (22m)



Example 6: Wood Burning Stove & Thermal Coil



Example 7: Wood Chip Boiler

5.1.4. To inform householders, local communities and businesses of the permitted development rights, the Welsh Government published clear and concise guidance known as “Generating Your Own Energy: A Planning Guide for Householders, Communities and Businesses”².

5.1.5. **It should be noted that all forms of micro-generation have the potential to have ecological impacts particularly in relation to protected species such**

² <http://gov.wales/topics/planning/policy/guidanceandleaflets/generaterenewable/?lang=en>

as bats. The potential presence of bat roosts in buildings as small scale works can still have the potential to cause adverse ecological impacts. Therefore, developers wishing to install micro-generation technologies will need to consider the presence of bats on site to ensure they comply with the Conservation of Species and Habitats Regulations (2010). The potential impact on bats can arise from either:

- **The installation of equipment and materials that passes through a roof void where a bat roost is located within the development. This applies to the installation of any fixtures to the roof or alterations to the roof such as might be required for solar panels; or,**
- **Operationally where there is a risk for bat strike against moving turbine blades where a micro-turbine is in the vicinity of a bat roost or along flight lines. This maybe within the development or nearby.**

5.1.6. **Due to the nature of bats the presence of roosts can often be overlooked. Consequently it is advised developers seek the advice of an ecological consultant prior to installing a micro-generation scheme which is likely to impact upon bats**³

Solar Energy Developments

5.1.7. Solar panels that are not 'permitted development' and which, therefore, require planning permission, should be sited as sensitively as possible on the host building. There are more likely to be concerns with highly prominent proposals on listed buildings, in conservation areas and on other historically notable buildings (including County Treasures and Positive Buildings in conservation areas), however, an appraisal of a site's context and the visual impact of the panels should be undertaken in every case. When submitting applications relating to solar panels, developers should consider:

- Integrating solar panels into development proposals at the outset, rather than relying upon future occupiers to retrofit them to a building e.g. the use of photovoltaic roof tiles in new housing schemes at the point of construction.
- The positioning of solar panels on less visible roof slopes;
- Installing solar panels flush with the roof plane and situated away from the eaves, verges and ridge of the roof;
- The use of photovoltaic roof tiles in place of solar panels to minimise the visual impact of the development, particularly in 'sensitive' locations.

³ Further information regarding the potential impact of micro-generation schemes on bats can be found here: <https://www.bats.org.uk/about-bats/threats-to-bats/wind-farms-and-wind-turbines/microgeneration-schemes>

Wind Energy Developments

5.1.8. Domestic wind turbines also benefit from permitted development rights. However where proposals do not meet the criteria, planning permission must be sought. Most wind turbines have a contemporary / functional appearance and there are more likely to be concerns with highly prominent proposals on listed buildings, in conservation areas and on other historically notable buildings (including County Treasures and Positive Buildings in conservation areas), however, an appraisal of a site's context and the visual impact of the turbine should be undertaken in every case. Developers should consider the balance between the visual impact of the turbine and its performance. When submitting an application for domestic turbines the following should be considered:

- Wind Turbines should be positioned to minimise their visual impact e.g. away from public roads and footpaths;
- Noise pollution generated as a by-product of wind turbines should be minimised to safeguard the amenity of neighbouring properties. This can be achieved through sensitive siting of proposals away from neighbouring boundaries.
- Topple distances of turbines need to be considered when deciding where to place them in relation to sensitive development such as residential premises. To ensure the safety of adjacent sensitive uses, proposed wind turbines should be positioned at a minimum horizontal distance equal to the tip height of the turbine plus 10% of its overall height measured from ground level to tip height away from sensitive development⁴.
- Shadow flicker is where sunlight or other light sources pass through the blades of a wind turbine while it is moving causing the shadow of the blades cast by the light to flicker. This can have a detrimental impact upon residential amenity and turbines placed within close proximity to residential premises will be resisted where it is likely to cause an unacceptable impact from shadow flicker.

Biomass Developments

5.1.9. Biomass heating can be used at the micro generation level, and this includes a variety of different approaches such as standalone stoves or boilers which are fuelled by burning organic material like wood fuel. For example, a wood burning stove can be used to heat all or part of a dwelling's water system. Where the proposed development for biomass technologies would require external works such as flues or outbuildings to house larger biomass generators, only the flues required for biomass heating have permitted development rights subject to the specific criteria found within Schedule 2 of the Town and Country Planning (General Permitted Development) Order (Wales) 2012 amendment. Internal

⁴ Based upon Principle of Good Practice produced by the Energy Networks Association - https://www.spenergynetworks.co.uk/userfiles/file/Energy_Networks_Association_Separation_Wind_Turbines_Overhead.pdf

works which include installing a wood burning stove within a listed building are likely to require permission and it is advised further information is sought from the Council's Planning Department before any works proceed.

5.1.10. Biomass heating developments at the small and medium scale generally provide heat for an individual or group of buildings and are normally located within a garage or other appropriate outbuilding to offer a base level of heating throughout the year. Homeowners considering applying for permission for biomass heaters should consider the following:

- Biomass heaters and their storage buildings should be positioned to minimise visual impact;
- Noise pollution generated by biomass boilers should be minimised to safeguard neighbouring properties' amenity through the use of noise attenuation measures such as sound absorbent cladding to outbuildings / garages or siting the generator away from sensitive development (e.g. residential uses). Where it is considered noise pollution is likely to be an issue, a noise impact assessment⁵ will be required to evidence whether the noise produced would be acceptable;
- Air quality should be maintained through the incorporation of proprietary pollution control systems;
- Ensure sufficient storage space for fuel to minimise the impact of regular fuel deliveries.

5.2. Micro Generation and the Historic Environment

5.2.1. To aid in Welsh Government's commitment to reduce CO₂ emissions and greenhouse gases owners of historic buildings can consider installing micro-generation systems in or near a historic building, a conservation area, a historic park or garden, an ancient monument or on an archaeological site. However, due to the importance of the historic environment to the cultural heritage and identity of the Vale of Glamorgan, proposals would need to be considered carefully, with particular thought given to protecting the fabric or character of the building or landscape and its setting. Through the careful consideration of the design and siting of micro-generation systems owners of historic buildings can help improve sustainability while also preserving the historic environment.

Siting

5.2.2. When deciding on where to site micro-generation systems, applicants should firstly look for appropriate locations situated away from the main historic asset of the site. For example it is highly unlikely equipment proposed to the principal elevation of a listed building or on a dominant roof line would be approved. In relation to the installation of solar panels it is considered preferable to locate this equipment as free standing units in a less prominent position or in the second instance on outbuildings such as garages.

⁵ TAN 11 - Noise (1997) contains guidance for undertaking a noise impact assessment under Annex A - <https://gov.wales/topics/planning/policy/tans/tan11/?lang=en>

Figure 24: Free Standing Solar Panels Sited Away From an Historic Building (Source: Cadw)



- 5.2.3. In some cases it will not be feasible to locate development away from the historic asset however; less prominent aspects of the building would be more appropriate such as hidden roof valleys or rear extensions. Positioning the development in screened locations can also help to lessen the potential visual impact of the proposal.

Figure 32: Solar Thermal Collectors Located within Hidden Roof Valley (Source: Cadw)



- 5.2.4. The setting of an historic asset is also a key consideration in terms of the location of a proposal. Applicants should seek to ensure all free standing equipment is integrated into the landscape or screened from view to maintain the setting of the historic asset. However, integration in relation to free standing wind turbines can be difficult to achieve, therefore, turbines should be sited against a landscape rather than open sky and have the lowest height feasible to reduce its impact on the historic setting. Where this is unlikely to mitigate the potential harm of development in sensitive locations applicants should consider other renewable technologies which are likely to have less of an impact. **Welsh Government have produced detailed guidance on how the setting of historic assets**

should be considered in Wales⁶, developers are advised to refer to this guidance where appropriate.

Design

- 5.2.5. As the technology has developed there are likely to be a better variety of different design options available to applicants which need to be considered in relation to the possible impact on the character of the historic asset. For example darker matte finishes should be sought where possible which help to minimise a proposal's prominence in relation to the historic building. Furthermore, the design and colour of visible ancillary equipment can be crucial to ensuring the proposal respects the historic environment such as pipes, frames, stands, poles or the housing of equipment. These should reflect the design of existing features such as guttering, chimney stacks or outbuildings where appropriate to ensure they do not detract from the character of the historic environment. The applicant should seek to reflect a building's scale and architectural form in proposals to ensure the development fits in with the overall character of the property.

Figure 43: Sensitive Housing of Biomass Boiler in Respect of Listed Building (Source: Cadw)



Cumulative Visual Impact

- 5.2.6. In the majority of cases historic buildings are capable of accommodating a degree of change; however, multiple installations are likely to inappropriately affect the historic environment due to a cumulative visual impact which would detract from the character that led to its designation. Furthermore, this is not restricted to developments relating to an individual building but also applies to buildings within a group such as within a Conservation Area. Therefore, the

⁶ **Setting of Historic Assets in Wales (2017) -**

<https://cadw.gov.wales/docs/cadw/publications/historicenvironment/20170531Setting%20of%20Historic%20Assets%20in%20Wales%2026918%20EN.pdf>

cumulative impact of proposals on the visual amenity of the historic environment must be considered.

6. Types of Large Scale Renewable Energy Developments in the Vale of Glamorgan

- 6.1.1. Large scale renewable energy developments are defined in national policy as ranging from 50kW to 10MW. Those developments which generate more than 10MW are considered under different consent regimes. However, Welsh Government is currently changing legislation ~~to allow authorities to permit renewable energy developments up to 50MW~~ **which will allow welsh ministers to decide on renewable energy developments between 10MW to 350MW excluding onshore wind energy which currently has no upper limit.**
- 6.1.2. **PPW edition 10 puts a greater onus on Local Planning Authorities to “support and guide renewable and low carbon energy development to ensure their area’s potential is maximised.” (PPW, para.5.9.8, 2018)** To aid developers seeking to invest in large scale renewable energy developments in the Vale of Glamorgan, the Council undertook a factual update in 2018 to our Renewable Energy Assessment (REA). The REA is based upon the Welsh Government’s “Practice Guidance – Planning for Renewable and Low Carbon Energy – A Toolkit for Planners” (2015) and consists of an assessment of the potential for low carbon energy generation within the authority. The update includes recent changes to mapping data relating to flooding and agricultural land classification produced by Natural Resources Wales (NRW) and Welsh Government. However, any future proposals would require more in-depth site assessments (see section 7).
- 6.1.3. The updated maps identify possible areas which have the potential to achieve a high yield of energy based upon the update to the high level studies undertaken by the Council. In regards to development management, the evidence produced by the toolkit will allow officers assessing applications for new development sites to understand the opportunities for alternative energy sources such as CHP schemes and can help officers understand why developers have chosen a particular location to develop a renewable or low carbon energy scheme. However, it is advised that further more detailed assessments will need to be carried out to support any future application coming forward in the Vale of Glamorgan. The maps produced by the updated REA (2018) can be viewed at Appendix 3 through to 6. **Where areas have been identified they will need to be considered in more detail as part of any future planning application in line with the relevant LDP policies. However, this must be balanced against the national policy position stated in PPW which states “There should be a presumption in favour of development in identified areas, including an acceptance of landscape change, with clear criteria-based policies setting out detailed locational issues to be considered at the planning application stage.” (PPW, para.5.9.8, 2018). Consequently, the resultant identified areas from the updated REA (2018) should not be used to undermine renewable energy development proposals outside of the identified areas**

which would still need to be assessed on a case by case basis based on their merits.

6.1.4. Within the Vale of Glamorgan area there are 3 forms of renewable energy which are considered to be the most prevalent: wind energy; solar energy; and biomass energy developments.

6.2. Onshore Wind Energy Development

6.2.1. Onshore wind energy generation is an established and proven technology with many examples currently used across the world. The UK has one of the largest wind energy resources in Europe, with Wales holding significant opportunities due to its environment. The Vale of Glamorgan shares these characteristics which have created potential areas that could support wind energy production.

6.2.2. Wind energy uses Turbines to generate energy from the wind by using the currents of air to move a rotor connected to an electrical generator. Most turbines are designed using a horizontal axis three-blade rotor system mounted on a steel mast. However; there are various other design options which can be used. Generally the smaller scale turbines can be installed with a free standing mast or mounted to a building. These types of turbines are commonly used to supply specific buildings or developments with electricity and are deployed as individual machines. Larger scale turbines can also be deployed as single machines but are more commonly used in groups which form wind farm developments. Wind farms are more likely to be situated within remote areas and directly supply power to the national grid.

6.2.3. In relation to the scale of wind turbines there are no rigid categories, however, the majority of on-shore wind turbines fall within four size bands: Micro, Small, Medium, and Large. The different sizes of turbines each produce different ranges of power; Table 2 demonstrates the typical power ranges for each scale of turbine. These ranges are not definitive but allow for a better understanding of the amount of power different turbines can generate.

Table 1: Typical Scales of Individual Wind Turbine Technologies

Scale	Typical Turbine Range	Typical Turbine Height (to blade tip)	Potential No. of Homes Supplied
Micro (<2.5kW)	2.5kW	11m	0.7
Small (1.5 – 50kW)	20kW	20m	6
Medium (50kW – 750kW)	500kW	65	205
Large (>750kW)	2.5MW	Up to 135m	1536

6.2.4. Large scale wind turbines also require additional infrastructure which is essential for the running of the turbine and should be included as part of any planning application. This can include the following:

- Access roads to the site and on-site tracks (large enough to accommodate HGVs for construction)

- A temporary construction compound and lay down area for major components.
- A concrete foundation pad for each turbine.
- An area of hard standing next to each turbine to act as a base for cranes during turbine erection, which is generally removed after construction.
- Underground cables connecting the turbines (buried in trenches).
- One or more anemometer mast to monitor wind direction and speed.
- A control building (to ensure the turbines are operating correctly) and a substation (which are often located in the same building).

6.2.5. Appendix 4 details the 3 areas within the Vale of Glamorgan which have the greatest potential to support large scale wind energy development based upon applying a series of constraints which restrict wind energy developments as outlined in Welsh Government guidance known as “Practice Guidance – Planning for Renewable and Low Carbon Energy – A Toolkit for Planners” (2015). The identified areas also have the highest generation capacity likely to be available in the Vale of Glamorgan area.

6.2.6. The Vale of Glamorgan has various aircraft related sites within the authority boundary. The safeguarded areas (Aviation Safeguarding Zones) are shown on the LDP Constraints Map. It is likely larger turbines located within the Civil Aviation Authority (CAA) aerodrome safeguarding area would not be permitted, therefore it is advised larger turbines are positioned outside of these safeguarding areas to ensure compliance with CAA guidelines contained within CAA Policy and Guidelines on Wind Turbines (CAP 764).

Figure 54: Example of a Medium Sized Turbine in the Vale of Glamorgan



6.3. Solar Energy Development

6.3.1. Solar energy development involves two types of solar energy production. The first involves the use of the sun’s energy to provide hot water via solar thermal systems. The second uses the sun’s energy to produce electricity through solar photovoltaic systems (PV).

Solar Thermal Systems

- 6.3.2. Solar thermal systems use solar collectors which are normally placed on the roof of a building and are used to pre-heat water for domestic use. Although the UK climate is not as hot and sunny as other countries, an effective solar thermal system can supply between 50-60% of heat demand from May to September.

Solar PV Systems

- 6.3.3. Solar PV systems come in two forms, building integrated systems or solar arrays. Building Integrated Systems is where the use of solar cells generate electricity for a specific building. These systems are normally roof mounted, however, recent technological advances are seeing the use of solar roof tiles within the UK which can be integrated into new buildings or used alongside existing roofing tiles/slates. This is predominately used to produce electricity for domestic use. Commercial scale solar energy is created using Solar Farms. These consist of freestanding arrays of solar panels mounted on fixed frames or systems that track the sun and feed the generated electricity into the national grid.
- 6.3.4. For all solar energy development within the UK the best performance of solar energy systems is created when collectors/panels are inclined at an angle of 20 to 45 degrees, facing due south and clear from shade.

Solar Farms

- 6.3.5. Both forms of Building Integrated Solar Generation (PV and Thermal) are permitted under general permitted development rights where they meet the specific criteria set out within the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2009. However, Solar Farms are not classed as permitted development and would therefore require planning permission.
- 6.3.6. Given the nature of Solar Farms and the common requirement for large parcels of land to support the development it is recommended that developers submit a request for a Screening Opinion to the Council to consider whether an Environmental Impact Assessment (EIA) is required under the EIA Regulations at the initial stages of the proposal.
- 6.3.7. Large commercial and industrial buildings present an opportunity to utilise under used roof space to position large solar arrays in appropriate positions. This approach can minimise the land capacity issues usually faced by typical solar farm developments.

Figure 65: An example of Solar Panels used on Industrial Buildings at the Renishaw Site



6.3.8. Appendix 7 shows the areas within the Vale of Glamorgan which are considered to have the highest potential in terms of generation capacity and the lack of major planning constraints for solar energy developments. This map builds upon the 6 local search areas identified under LDP Policy MG30 - Local Search Areas for Solar Energy based upon the update to agricultural land classification which now differentiates between 3a and 3b agricultural land. **The updated potential solar search areas do not replace those identified under LDP Policy MG30 - Local Search Areas for Solar Energy but rather identifies other areas which also have solar energy potential based upon an update within the evidence base. These new areas of potential solar energy should be viewed as an indication of solar energy potential and not as a specific area of safeguarded land for solar development. Within the identified areas further refinement would need to be undertaken to identify specific opportunities for detail development proposals. Any development proposals in the identified areas would still need to demonstrate that they would not have an unacceptable impact on adjoining land in terms of the impact on amenity, heritage assets and the wider environment as well as complying with all relevant policies within the LDP. However, this would need to be considered in light of PPW which states “there should be a presumption in favour of development in identified areas, including an acceptance of landscape change” (PPW, para.5.9.8, 2018).**



6.4. Biomass Developments

- 6.4.1. Biomass is the broad term relating to heat and electricity generation which is derived from materials of biological origin such as plant and animal matter. Biomass heating technology can be stored to provide heat to a variety of buildings of all sizes through the use of individual boilers or using district heating networks (DHNs). More recently Biomass technology has been used to generate electricity and within combined heat and power (CHP) plants due to the low carbon emissions it produces.
- 6.4.2. The main types of Biomass used in the UK are sourced from wood-fuel, energy crops, wood waste, agricultural residues and the biodegradable matter contained within municipal solid waste (MSW). Unlike the previous forms of energy production, Biomass does produce carbon emissions which are released when the energy is generated. However, it is still considered a sustainable fuel due to carbon balancing where the CO₂ released when energy is generated from biomass is balanced by the CO₂ absorbed during the biological matters growth. Where carbon balancing is not effective the CO₂ emissions produced per unit of energy are still much lower than those produced through fossil fuels.
- 6.4.3. Like other forms of energy production biomass comes in a range of different sizes. Table 3 below sets out the typical scales used for biomass energy plants:

Table 2: Typical Scales of Biomass Energy Plants

Scale	Typical Capacity	Description
Small	<500kW _{th}	Currently small scale applications below a few hundred kilowatts are virtually all designed as heat plant for domestic and small commercial use. These may comprise of standalone stoves or boilers.
Medium	500kW _{th} – 10MW _{th}	This range is used largely for the production of heat, covering a wide range of applications including individual buildings and larger developments serving multiple buildings. The use of biomass CHP for the production of both heat and electricity currently tends to fall in this category, although larger scale plants are also now being encouraged to find ways to utilise any heat that is generated.
Large	>10MW _e	Plants at this scale are used primarily for the production of electricity. Some types of biomass are also used in very large conventional power plants alongside coal – this is known as ‘co-firing’.

- 6.4.4. Appendix 5 identifies the land within the Vale of Glamorgan which could be used to produce biological material which could fuel biomass plants subject to the relevant planning permissions and permits being approved. Appendix 6 identifies the areas in the Vale of Glamorgan which would benefit from DNS and CHP schemes which could be fuelled by small to large scale biomass developments.

7. Planning Considerations for Large Scale Renewable Energy Developments

- 7.1.1. There are a variety of issues which need to be assessed when considering the implications of new renewable energy developments. This section seeks to draw out the main factors developers / landowners need to consider when forming their proposals for renewable energy schemes within the Vale of Glamorgan. Many of the considerations are shared across all forms of renewable energy development, however, where specific consideration needs to be given to certain types of development this has been specified below.
- 7.1.2. Appendix 1 outlines the likely requirements needed to support a planning application for large scale renewable energy developments where relevant to the type and scale of the proposal.
- 7.1.3. The most common considerations relating to proposed renewable energy development are listed below; however, each case should be assessed individually upon its own potential constraints and merits. Therefore, the following should be used as a guide and not a definitive list.

7.2. Vehicular Access and Wider Transport Network

- 7.2.1. Vehicular access is essential for all forms of renewable energy development during the construction phase and the ongoing operation of the facility.
- 7.2.2. Large scale turbines and wind farms are generally located within rural / remote areas. Therefore, transport routes need to be planned carefully and considered at the early stages of the process to take account of the potential size of the components needed to construct the turbines and limitations along the minor roads which serve remote areas which could limit the suitability of sites. The amount and type of traffic movements during the construction and operation of a wind turbine / farm will depend on the number and type of turbines proposed and the length of the construction period.
- 7.2.3. Biomass plants need biomass fuels to generate energy and also create subsequent by-products which may need to be transported from the site. These traffic movements to and from the site during the plants operation need to be considered.
- 7.2.4. To minimise the potential impacts a proposed development can have on the transport network, a Traffic Management Plan should be prepared to determine the most appropriate times and routes for construction traffic. The Traffic Management Plan should include measures for vehicle sharing and the avoidance of HGV deliveries during peak periods to minimise vehicle movements on minor roads. In some cases temporary traffic management

systems for site access and reduced speed limits on identified roads might be appropriate mitigation methods that should be considered.

7.3. Landscape and Visual Impacts

- 7.3.1. The Vale of Glamorgan benefits from having large areas of high quality landscape, which have been designated within the LDP. These include the Glamorgan Heritage Coast and Special Landscape Areas (SLAs) at a local level and other national designations which must be considered in any application. Therefore, it is essential that appropriate measures are taken in the siting, design and layout of large scale renewable energy developments. A Design and Access Statement (DAS) should be submitted which explains how the landscape and visual considerations have been taken into account in the design of the scheme. The DAS should be informed by a Landscape and Visual Impact Assessment (LVIA) and Cumulative landscape and Visual Impact Assessment (CLVIA). These assessments should employ tools such as photomontages and assess the wider landscape and visual impact of proposed development. A detailed description on what is required for a LVIA can be found in Guidelines for Landscape and Visual Impact Assessment (GLVIA)
- 7.3.2. In regards to the CLVIA, the assessment needs to look beyond the study area identified in the LVIA. Although only effects that occur within the LVIA study area are assessed these assessments need to consider the consequence of other developments located outside of the study area but their identified impact area is within the proposed developments LVIA study area. Therefore the search area for operational, consented and planned developments will always be larger than the study area in which the effects occur. The greater scale of development, such as the height of the turbine, the more extensive the required search area, table 4 shows the required CLVIA search area for turbines of different heights:

Table 3: CLVIA Search Areas

		Typology of Proposed Turbine(s)				
		Micro	Small	Medium	Large	Very Large
Height of Operational, Consented and planned Turbine(s)	Micro	2km	2km	2km	2km	2km
	Small	2km	8km	8km	8km	8km
	Medium	2km	8km	12km	12km	12km
	Large	2km	8km	12km	17km	17km
	Very Large	2km	8km	12km	17km	23km

The search area extends from the proposed turbine(s).

- 7.3.3. Large scale wind turbines are tall structures which can have a significant impact on the surrounding landscape because they are likely to be visually prominent. Appendix 8 details the different information required for the different sized turbines.

- 7.3.4. It should be noted that the impacts not only relate to the renewable energy equipment alone but the various ancillary infrastructure related to the development such as new or widened access roads.
- 7.3.5. Due to their potential size solar farm developments can have a significant impact upon sensitive landscape areas particularly where there is a proliferation of solar farm developments concentrated in one area which can lead to a cumulative impact. A proposal's potential impact upon sensitive landscapes will be a key consideration in determining the need for an EIA. Therefore, proposals should avoid development in sensitive locations wherever possible.
- 7.3.6. One of the potential effects of the cumulative impact of Solar Farms on the landscape is the creeping urbanisation of the countryside as the regular pattern of PV panels and the associated infrastructure needed to support development covers large areas of land and do not reflect the typical characteristics of a rural area.
- 7.3.7. Large biomass schemes are industrial in character and can result in landscape and visual impacts to the surrounding area if they are not considered fully. The siting and design of these plants is therefore very important in minimising these potential adverse impacts. These types of biomass plants should be situated in an area which reflects their industrial character and does not interfere with existing landmarks such as existing industrial sites. To help a proposed biomass plant integrate with its surroundings, developers should use materials and colours which reflect the surrounding landscape of the development to ensure the proposal respects its setting.
- 7.3.8. Possible mitigation methods for potential adverse impacts upon landscape and visual amenity can include the incorporation of existing landscape features within the development or using new planting to help screen the development reducing its visibility within the landscape. However, new planting will need to avoid potential shading of the proposed PV panels. Furthermore, screen planting can change the sense of enclosure within the landscape; therefore, careful planning at the design stage is necessary to ensure new planting reflects the existing characteristics of the landscape.
- 7.3.9. With regards to the potential cumulative impact renewable energy developments can have on an area Appendix 3 identifies all the known renewable energy and low carbon schemes which either have planning permission or are operational at the time of publication (December 2018) in the Vale of Glamorgan to help inform CLIVAs. Please contact the Council's Planning Department for more detailed information if required.

7.4. Noise Pollution

- 7.4.1. Operating wind turbines have two sources of noise; mechanical noise created from the generator / gearbox and aerodynamic noise created by the rotor blades moving through the air. Modern designs have attempted to reduce the mechanical noise to mirror the level of aerodynamic noise produced which is considered to be more acceptable. However, an increase in noise levels at nearby residences would still likely occur, therefore, careful consideration to the siting and layout of proposals is important to ensure that increases in noise levels are kept to acceptable levels. The most effective way to mitigate noise pollution is to ensure that it is located away from noise sensitive development such as housing. Where this is not possible the operational noise levels must fall below the established limit set out under ETSU-R-97 (The Assessment and Rating of Noise from Wind Farms (1997) Energy Technology Support Unit). This should be demonstrated by the submission of a noise impact assessment to support a planning application for wind turbine development. Where noise limits have been identified these will be included within the planning conditions for a proposal to ensure development is kept within reasonable sound levels during operation.
- 7.4.2. Where it is considered a proposed wind turbine is within close proximity to residential development the general rule of siting a wind turbine 500m away from the nearest residential property should be applied unless supporting documentation such as a noise impact assessment can evidence the proposal would have less of an impact. TAN 8 Planning for Renewable Energy contains further guidance relating to noise impact assessments for wind turbine developments.
- 7.4.3. Biomass plants can also create substantial noise pollution which is caused by the combustion process and additional traffic noise generated by HGV deliveries. An appropriate site layout is imperative to reducing the potential noise pollution caused by a proposed plant. For example, locating loud equipment away from existing sensitive uses near the proposed site will help to minimise noise pollution to existing neighbouring occupiers and uses. Furthermore, when constructing a Biomass plant, noise attenuation features should be used in the walls and roof of the plant to reduce the potential noise 'break-out'. Where appropriate, planning conditions will be used to further limit the impacts created from noise pollution through restricting the operational hours of the plant to reasonable working hours in the day.

7.5. Ecological Impacts

- 7.5.1. Wind energy schemes have specific ecological impacts which can result in the loss of habitat and the disturbance and fragmentation of plant and animal species. However, the operation of the wind turbine can also have ecological impacts such as the disturbance of habitats and aerial animal species such as

birds **and bats** colliding with the turbine blades. Further guidance relating to the impact developments can have upon biodiversity can be found within the Council's Biodiversity and Development SPG⁷.

- 7.5.2. In regards to mitigating the impact caused by site infrastructure, buffer protection zones should be used for identified sensitive habitats and species on the application site to allow infrastructure to be situated away from sensitive areas, **for example siting turbines away from dark linear features such as hedgerows, that are used by bats for commuting and foraging.** Furthermore, species specific measures can also be taken to minimise the potential ecological impacts. In relation to the turbine blades colliding with animals such as birds and bats, the micro-siting of turbines within a development site away from identified areas of high flight activity will minimise the potential for collisions.
- 7.5.3. The ecological impacts of all proposed renewable energy developments will be a key determining factor when considering the need for an EIA. Developments should be located away from identified sites of ecological importance. Both the construction and the operation of the development can cause adverse effects on the ecology of an area. However, there are a variety of mitigation methods which can be appropriate to reduce the impact upon these sensitive areas. Within the construction phase of development this can include:
- Retaining existing habitat features
 - Avoid construction during breeding seasons of relevant species
 - Translocation of sensitive species if appropriate
- 7.5.4. Possible mitigation methods during the operation of development include:
- Increasing separation of solar panels
 - Including wildlife highways
 - **Wind turbines conditioned to be switched off during certain times of the year or at night during sensitive periods, dependent on their proximity to certain types of bat roosts or bird habitat**
 - Avoid excessive security lighting.
- 7.5.5. Additionally, based upon the scale of developments, developers should seek to enhance biodiversity where appropriate. Opportunities for enhancement should be identified through the preparation of a Habitat Management Plan.
- 7.5.6. Solar farms can present an opportunity to enhance habitats, for example, the inclusion of hedgerows to the boundaries of developments creates nesting and foraging areas and a means for wildlife to move between habitats. Where there are existing hedgerows developers should seek to minimise any loss of habitat by using existing entrances to the site and refraining from removing hedgerows

⁷ Biodiversity and Development SPG (2018) - <http://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/Biodiversity-and-Development-SPG-2018.pdf>

where possible. Furthermore, developers are encouraged to consider strengthening existing hedges through planting gaps using suitable species appropriate to the locality. Proposals should also include buffer strips between the solar panels and the boundaries of the site. Buffer strips should aim to be 7 to 10 metres wide to ensure the best benefit to biodiversity on a site. These buffer strips are wild sections of land which are usually left uncut for 2 to 3 years to allow the habitat to develop. Post development, effective management of the site is vital to ensure the success of biodiversity enhancements.

Figure 76: Example of Hedgerows to Site Boundaries (Source: BRE)



7.5.7. The development of a Biomass plant can also result in potential adverse impact upon ecology within the proposed area through the loss of habitat, disturbance and fragmentation of species caused by the construction and operation of the plant. Furthermore, due to the noise, airborne and waterborne emissions caused by the operation of the plant can also disturb local habitats and species and will need to be considered as part of the application process.

7.5.8. Most of the impacts caused by the construction and operation of the plant can be appropriately mitigated through implementing the following methods over the development:

- Locating plant and ancillary buildings away from sensitive habitats
- Exclusion fencing and translocation programmes
- Covering excavation works
- Providing escape ramps for wildlife
- Use of speed limits on site
- Undertaking clearance work outside of breeding season (March-August)
- Protecting watercourses and maintaining hydrological regimes

7.6. Drainage

- 7.6.1. Renewable energy schemes and their associated works have the potential to impact upon watercourses, bodies of water and groundwater as a result of the construction process. To understand how the development will impact upon these areas applications should be supported by an Environmental Management Plan prior to the construction of the development to mitigate any potential risk caused by the proposal.
- 7.6.2. In general, developments need to minimise the potential flood risk and surface water run-off through:
- Minimising the area of impermeable surfaces.
 - Reinstating vegetation where possible.
 - Providing storage and attenuation ponds in line with sustainable drainage techniques (SuDs).
 - Using appropriate culverts and drains to maintain existing hydrological regimes.
- 7.6.3. Most biomass plants will require a water supply for steam production and condensing to generate power. The responsibility for the control of water quality and water abstraction is with the Natural Resources Wales (NRW). Therefore, the developer will need to consult with NRW to discuss what permits are required at the earliest opportunity. Development cannot begin until an Environmental Management Plan has been submitted and agreed to ensure any potential risk to ground water and surface water is mitigated.

7.7. Historic Environment

- 7.7.1. All renewable energy developments have the potential to impact upon cultural heritage and / or archaeological features. However, it is more likely large scale schemes would have an impact upon these features due to the size of the development site. Where necessary, trial trenching and an archaeological watching brief should be undertaken prior to and during the construction phase of proposed schemes. ~~PPW~~ **National policy** notes that where nationally important archaeological remains and their settings are likely to be impacted, there should be a presumption in favour of their preservation in situ. Where the remains are of lesser importance the LPA needs to weigh the relative importance of the archaeological features against the need for the proposed development **potentially with the need for archaeological mitigation if appropriate. For larger scale developments, pre-determination mitigation may include archaeological and historic environment assessments, including geophysical or other survey, and potentially field evaluation; there may remain the potential for post-determination fieldwork, post-excavation and reporting. The earliest stage consultation and implementation of mitigation is strongly recommended. For sites where solar or wind turbines are**

proposed, connection routes to the national grid may also impact on archaeological resource and require mitigation; supplying detail of these early stage ensures informed mitigation. As noted, for sites with non-statutory designations, archaeological mitigation work may be required both pre and post determination to ensure that development complies with PPW, and the TAN24: The Historic Environment.

7.7.2. **All archaeological work undertaken in relation to planning and development issues should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists and it is our Policy to recommend that either a Registered Organisation with the ClfA or a member with MCIfA level membership should undertake the work**⁸.

7.7.3. In relation to sensitive historic environments such as conservation areas, listed buildings, **registered historic park and gardens, scheduled monuments** and locally designated historic buildings (known as County Treasures) proposed schemes which are above the micro scale are unlikely to be permitted within or in close proximity to these designations due to the impact such development can have on the historic setting of these areas. Applicants should seek to locate development away from these designations and their settings to ensure the historic fabric is preserved in the Vale of Glamorgan.

7.8. Agricultural Land

7.8.1. Based on the nature of Solar Farms it is likely they will be located on agricultural land, this can also be true of wind energy developments and anaerobic digestion biomass facilities. However, these forms of development can be considered as farm diversification schemes⁹ which allow for more flexibility in terms of planning considerations. However, in other instances PPW protects the best and most versatile (BMV) agricultural land (grades 1, 2 and 3a) and states BMV land *“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.”* **(PPW, para.3.55, 2018)**

7.8.2. To help mitigate against potential adverse effects these types of schemes can have on BMV land, steps should be taken at the construction phase to enhance the reversibility of the development and should be evidenced within a planning application. Possible considerations are the:

- Use of removable mats as access tracks
- Use of ground screws to secure PV panels

⁸ **Further details can be found at: www.archaeologists.net/cifa and www.archaeologists.net/ro**

⁹ See TAN 6 Planning for Sustainable Rural Communities (2010) - <https://gov.wales/topics/planning/policy/tans/tan6/?lang=en>

- Avoidance of soil compaction and contamination

7.8.3. Due to the nature of solar farm developments and wind turbines, the agricultural land can still offer some benefit through the use of low intensity grazing. This provides a low cost means of managing grassland and enables the land to remain agriculturally productive. Where low intensity grazing is an option, a professional ecologist should be consulted to ensure an effective grazing regime for the site that would be best suited to the area's characteristics and the biodiversity objectives for the development.

Figure 87: Example of Low Intensity Grazing (Source: BRE)



7.9. Aviation and Telecommunications Constraints

7.9.1. In regards to wind turbines, they can pose a significant danger to air traffic safety as they represent a collision risk for low flying aircraft and they can interfere with air traffic control radar and aircraft landing instruments. The Civil Aviation Authority (CAA), the Ministry of Defence (MoD), and National Air Traffic Services (NATS) should be consulted on wind energy schemes at the earliest stages of the planning process.

7.9.2. The Vale of Glamorgan has various aircraft related sites within the authority boundary. The LDPs Constraints Map details the safeguarded areas (Aviation Safeguarding Zones) within the Vale of Glamorgan where the Civil Aviation Authority (CAA) should be consulted for structures which exceed 45m within these zones. The LDP Constraints Map can be viewed using the following link:

<http://myvale.valeofglamorgan.gov.uk/LDP2017Constraints.html>

7.9.3. In particular the presence of Cardiff International Airport and the St Athan MoD effect the acceptability of turbine development above the micro scale which exceeds the permitted development criteria of 15m for wall mounted turbines and 11.1m for free standing turbines. It is likely larger turbines located within the

Civil Aviation Authority (CAA) aerodrome safeguarding area would not be permitted, therefore it is advised larger turbines are positioned outside of these safeguarding areas to ensure compliance with CAA guidelines contained within CAA Policy and Guidelines on Wind Turbines (CAP 764). In any case, it is advised developers should consult with the CAA and aerodrome operators when proposing turbines above permitted development rights to ensure aerodrome operators are aware of possible obstructions to flight paths and radar ranges. The Council has undertaken a high level assessment of potential wind resource areas likely to be appropriate for future development for wind turbines, the spatial results of this assessment can be found under Appendix 4 which accounts for the CAA safeguarding areas.

- 7.9.4. In regards to telecommunications, wind turbines can interfere with the transmission signals by blocking, deflecting or scattering signals. Where a telecommunication link crosses a wind farm development site, Ofcom should be consulted to advise the developer on the appropriate fixed link operator. Furthermore, developers should contact interested bodies directly; this includes local utility companies and emergency services where applicable.

7.10. Shadow Flicker

- 7.10.1. Shadow flicker is caused when the sun passes behind the rotor blades of a wind turbine which casts a shadow that flicks on and off as the blades rotate. These incidents can cause serious disturbances for affected neighbouring residents in properties within close proximity of the proposed development and even result in harmful impacts upon sufferers of photo-sensitive epilepsy. These potential impacts can be mitigated through the micro-siting of turbines as far away from sensitive residential development as possible. Furthermore, the use of vegetation to screen the shadow flicker can also minimise the potential impact. If the shadow flicker impact is severe this may result in the refusal of a planning application.

7.11. Wind Speed

- 7.11.1. This is an important factor for considering the suitability of a proposed location for wind turbines. Turbines operate between a range of wind speeds defined as:
- Cut-in – This is the speed at which a turbine begins to generate power. Below this speed the turbine will remain stationary.
 - Rated – This is the speed at which the turbine produces its rated power generation i.e. 750kW
 - Cut-out – This is the maximum speed the turbine can operate safely. Above this speed the turbine will stop moving and remain stationary until the wind speed returns to a safe range.

7.11.2. Based on the cut-in and cut-out ranges the typical turbine in the UK will be operational for approximately 70-85% of the time. To ensure a potential site for wind turbines is suitable a wind profile of the area should be taken to monitor the small variations in annual average wind speed, as power produced from wind is equal to the cube of the wind speed. For example, an area with an average wind speed of 8m/s would produce approximately twice as much power of an identical machine located in an area with an average wind speed of 6m/s. Wind speed profiles should take place during the feasibility stage of the development process to establish average wind speeds and to inform the modelling of turbine positioning to optimise energy yields. Common practice for wind speed monitoring for large scale turbines involves the erection of a meteorological mast at the site which must be equal in height to the hub of the proposed turbines.

7.12. Land Capacity

7.12.1. One of the main constraints relating to the development of Solar Farms is the availability of suitable land. To maximise the solar radiation gained from the land, a site needs to be facing due south as the UK receives the highest amount of solar irradiation in the southern and western areas of the country. In regards to the Vale of Glamorgan it is geographically well-placed to receive a significant amount of solar radiation making it a good opportunity area for solar development; Appendix 7 identifies the best areas for potential solar energy to aid future development of this resource. Furthermore, to produce a viable amount of energy from solar schemes 2.5 to 3ha of land is required on average to produce 1MW of energy. Additionally, a sites proximity to a suitable national grid connection will also need to be considered when identifying a suitable land.

7.13. Glint / Glare of Solar Arrays

7.13.1. Although PV panels are designed to be dark in colour and use a non-reflective coating to maximise the potential solar radiation absorption, direct intense sunlight, bright skies and the metal supporting frames of panels can result in the reflection of sunlight. This can create a glint or glare affect which can cause safety concerns as it becomes a distraction to viewers and it also emphasises the potential impact the development will have on the surrounding landscape. Therefore, developers should submit glint and glare assessments to support planning applications for Solar Farms in the Vale of Glamorgan to ensure the safety of development and reduce its impact on the landscape.

7.14. Security

7.14.1. **Security of energy supplies is important for economic and social well-being. Where facilities are located in areas prone to crime or in isolated areas consideration needs to be given to security further advice can be obtained from Police Design Out Crime Officers.**

8. Further Information and Contacts

- 8.1. Further advice on all aspects of this guidance can be sought from the Council's Planning Department. Prior to formal submission of a planning application, the Council encourages applicants to utilise the Council's pre-application service which can save unnecessary work, costs and delays caused by negotiations. Further information on the Council's pre-application advice service can be found on the Council's website: www.valeofglamorgan.gov.uk

Development Management

Dock Office

Barry Docks

Barry

CF63 4RT

Tel: Duty Officer - (01446) 704681

Email: planning@valeofglamorgan.gov.uk

Designing out Crime Officer

South Wales Police

Territorial Policing Hub

South Wales Police Headquarters

Tel: 01656 655555 Ext: 29251

Jon.Brown@south-wales.pnn.police.uk

9. Further Guidance and Information

- Agricultural Good Practice Guidance for Solar Farms. July 2014. BRE. Available at: https://www.bre.co.uk/filelibrary/nsc/Documents%20Library/NSC%20Publications/NSC_-_Guid_Agricultural-good-practice-for-SFs_0914.pdf
- CAP 764: Policy and Guidelines on Wind Turbines. February 2016. Civil Aviation Authority. Available at: <https://publicapps.caa.co.uk/modalapplication.aspx?catid=1&pagetype=65&appid=11&mode=detail&id=5609>
- Climate Change Strategy for Wales. October 2010. Welsh Government. Available at: <https://gov.wales/topics/environmentcountryside/climatechange/emissions/climate-change-strategy-for-wales/?lang=en>
- Consenting Energy Generation Infrastructure. March 2018. National Assembly for Wales. Available at: <https://seneddresearch.blog/2018/03/29/new-publication-the-planning-series-17-consenting-energy-generation-infrastructure/>
- Energy Wales: A Low Carbon Transition Delivery Plan. March 2014. Welsh Government. Available at: <https://gov.wales/docs/desh/publications/140314energy-wales-delivery-plan-en.pdf>
- Energy Wales: A Low Carbon Transition. March 2012. Welsh Government. Available at: <https://gov.wales/docs/desh/publications/120314energywalesen.pdf>
- Generating Your Own Energy: A Planning Guide for Householders, Communities and Businesses. 2011. Welsh Government. Available at: <https://gov.wales/topics/planning/policy/guidanceandleaflets/generaterenewable/?lang=en>
- National Solar Centre Biodiversity Guidance for Solar Developments. April 2014. BRE. Available at: <https://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf>
- Planning for Renewable and Low Carbon Energy - A Toolkit for Planners. September 2015. Welsh Government. Available at: <https://gov.wales/topics/planning/policy/guidanceandleaflets/toolkit-for-planners/?lang=en>

- Planning Guidance for Smaller Scale Wind Turbine Development Landscape and Visual Impact Assessment Requirements. April 2015. The Heads of the Valleys Landscape Officers and Planners. Available at:
https://www.caerphilly.gov.uk/CaerphillyDocs/LDP/PG_Smaller_Scale_Wind_Turbine_Developments.aspx
- Planning Implications of Renewable and Low Carbon Energy. February 2011. Welsh Government. Available at:
<https://gov.wales/topics/planning/policy/guidanceandleaflets/planningimplications/?lang=en>
- Planning Policy Wales, Edition 9. November 2016. Welsh Government. Available at:
<https://gov.wales/topics/planning/policy/ppw/?lang=en>
- Renewable Energy and your Historic Building: Installing Micro-generation Systems - A Guide to Best Practice. 2010. Cadw. Available at:
http://cadw.gov.wales/docs/cadw/publications/Micro_gen_booklet_EN.pdf
- Renewable Energy in Wales: in figures. August 2013. National Assembly for Wales. Available at:
<http://www.assembly.wales/Research%20Documents/Renewable%20Energy%20in%20Wales%20in%20figures%20-%20Research%20paper-12082013-248986/13-059-English.pdf>
- River Basin Planning Guidance. July 2014. Welsh Government. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/339471/river-basin-guidance-final.pdf
- Technical Advice Note 8: Planning for Renewable Energy. July 2005. Welsh Government. Available at:
<https://gov.wales/topics/planning/policy/tans/tan8/?lang=en>
- **Managing Change to Registered Historic Parks and Gardens in Wales. 2017. Cadw and Welsh Government.**
<https://cadw.gov.wales/docs/cadw/publications/historicenvironment/20170531Managing%20Change%20to%20Registered%20Historic%20Parks%20&%20Gardens%20in%20Wales%2026922%20EN.pdf>
- **Heritage Impact Assessment in Wales. 2017. Cadw and Welsh Government.**
<https://cadw.gov.wales/docs/cadw/publications/historicenvironment/20170531Heritage%20Impact%20Assessment%20in%20Wales%2026917%20EN.pdf>
- **Managing Change to Listed Buildings in Wales. 2017. Cadw and Welsh Government.**

<https://cadw.gov.wales/docs/cadw/publications/historicenvironment/20170531Managing%20Change%20to%20Listed%20Buildings%20in%20Wales%2024303%20EN.pdf>

10. Appendices

10.1. Appendix 1: Planning Application Requirements for Renewable Energy Proposals

10.1.1. In general renewable energy proposals which are above the micro scale (more than 50kW) should be supported by the following evidence where relevant alongside the submission of a planning application and relevant plans:

- **Design and Access Statement** - This should be included where the proposal would be classed as major development (i.e. where the development carried out on a site having an area of 1 hectare or more). This document assesses the design of the proposal and evaluates its context. The scope of the document should be proportional to the scale of development.
- **Scale and Capacity Information** - The size of development and the potential energy return once installed.
- **Landscape Visual Impact Assessment** - Assesses the proposal in terms of its surrounding landscape and visual impact. The assessment should identify the sensitivity of the area to the proposed change. It should also differentiate between the likely impact the proposal would have on the local and wider landscape character. The assessment should clearly assess the physical effects of the proposal on the landscape separately from the visual impact. Regarding the visual impact, the assessment can be done through various methodologies such as Zones of Theoretical Visibility (ZTV) or accurate photo-montages from a comprehensive range of viewpoints. Included within the assessment should be details relating to any proposed or existing mitigation to identified visual impacts e.g. screening through the use of existing vegetation or new fencing / planting.
- **Historic Environment Assessment (where relevant)** - Where the development would have an ~~an~~ direct impact on the historic environment, **(such as** ~~as~~ ~~scheduled ancient monuments, listed buildings, conservation areas, buildings of local significance (county treasures) and archaeological sites) of interest,~~ an assessment of the potential impacts and any appropriate mitigation methods would be required. **(see PPW 2018 sections 6.1.9; 6.1.10; 6.1.19; 6.1.21; and 6.1.23)**
- **Ecological Study** - An ecological survey which identifies any species or habitats present on the site / area affected by the proposal. It should also include an assessment of the local and wider impact on the natural environment, habitats and species and any proposed mitigation and / or enhancement. The Council's Biodiversity and Development SPG (2018) contains further details in relation to what is required from an Ecological Study and the possible methods of mitigation.
- **Traffic Assessment and Infrastructure Considerations** - This assessment should consider the impacts on public rights of way and the local / strategic road networks. It should also include any requirements for new or upgrading existing infrastructure required to facilitate construction and the ongoing

maintenance of the proposal. A traffic management plan may also be required but this will be dependent on the scale of the development.

- **Hydrological Assessment** - This should assess the possible changes to hydrology in the area caused by the proposal and the potential increase in surface water run-off. Depending on the area and the possible impacts a flood consequences assessment might be required.
- **Noise Assessment (where relevant)** - Assesses the noise implications of a proposal.
- **Light Assessment** - An assessment of light implications which could include, glare, shadow flicker, aviation considerations etc.
- **Air quality assessment** - This will be required on proposals which produce emissions such as low carbon technologies e.g. biomass developments. Depending upon the scale of development, the quantity and type of emissions produced a simple or detailed assessment would be required. A Simple Assessment is one relying on already published information and without quantification of impacts, in contrast to a Detailed Assessment that is completed with the aid of a predictive technique, such as a dispersion model. An air quality assessment should demonstrate the likely changes in air quality or exposure to air pollution, as a result of a proposed development.
- **Cumulative Impact** - Is an assessment of the proposal in relation to similar developments in the surrounding area which could detract from the character of an area.

Environmental Impact Assessments (EIAs)

10.1.2. EIAs are intended to prevent, reduce or offset the detrimental environmental impacts development can create and also allows an opportunity for proposals to enhance positive outcomes the development could have on the environment. The requirement for EIAs comes from the EU directive 2011/92/EU and is included in Welsh law through the Town and Country Planning (Environmental Impact Assessment (Wales)) Regulations 2017¹⁰. Where a landowner / developer is unsure whether an EIA applies, they should seek a screening opinion from the Local Planning Authority which will assess whether an EIA would be required for the proposed development.

10.1.3. If an EIA is required an Environmental Statement (ES) must be submitted alongside any planning application. At this stage the applicant may wish to apply for a further scoping opinion from the Local Planning Authority which would detail the extent of the ES. Schedule 4 of the EIA Regulations outlines the information which should be included within an ES.

Habitats Regulations Assessments (HRA)

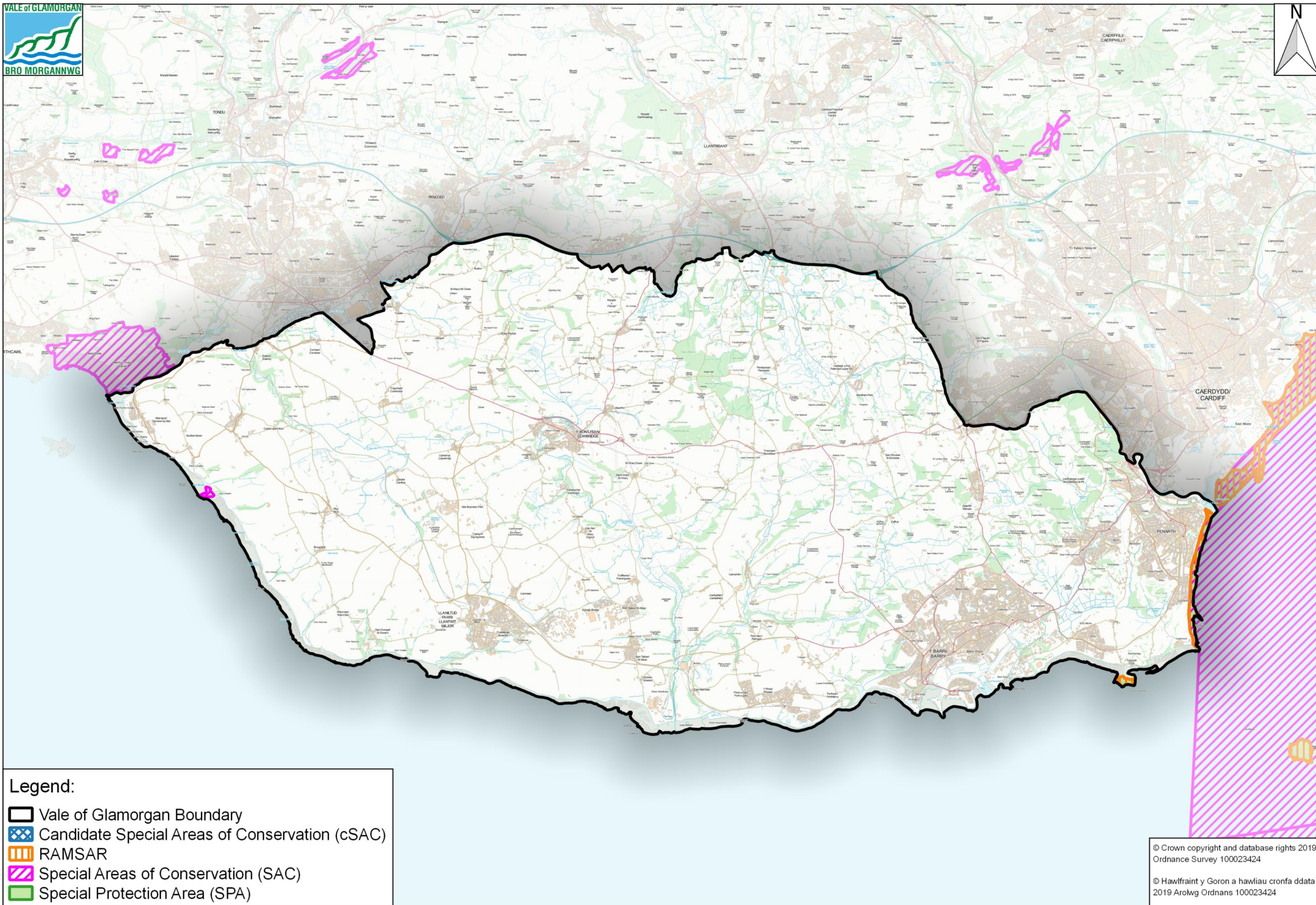
10.1.4. HRAs are required under the Conservation of Habitats and Species Regulations 2017 which is directed by the Habitats Directive 92/43/EEC. A HRA is used to

¹⁰ The regulations can be viewed at <https://www.legislation.gov.uk/wsi/2017/567/contents/made>






determine whether a project would likely have significant impacts on the conservation objectives of **Natura 2000** sites, designated for their European importance for nature conservation, which include Special Protection Areas (SPAs) **and** Special Areas of Conservation (SAC) ~~, Sites of Special Scientific Interest (SSSI), Marine Conservation Zones (MCZs) and RAMSAR sites.~~ **An appropriate assessment is also required, as a matter of Government policy, for potential SPAs, candidate SACs and listed RAMSAR Sites (i.e. wetland sites of international importance designated under the Ramsar Convention).** Any project which has the potential to impact upon these designations will be subject to a HRA; therefore, Appendix 2 details the European sites within or adjoining the Authority which could be affected by a proposed project. Different consents are also likely to apply to those developments which affect these European sites which ~~work~~ **are also required in addition to a** ~~outside of the planning system~~ **consent. It should be noted that the need for licenses are also relevant to developments that are not subject to a HRA.** Natural Resources Wales (NRW) **and the Marine Management Organisation (MMO)** can provide further details regarding the species and marine licences which would likely be needed **in relation to development proposals.**

- 10.1.5. Where a HRA is considered to be required, **the competent authority, which is likely to be** the Local Planning Authority, must undertake a screening test known as a Test for Likely Significant Effect (TLSE). If the findings of the test indicate the potential impact ~~would~~ **may have a detrimental effect** ~~undermine the conservation objectives for any feature of a European site~~ this triggers an Appropriate Assessment. **Both stages of the HRA need to consider the proposal alone and in-combination with other plans or projects.** This assessment is carried out by the Council, however, the applicant must supply the information required to undertake the evaluation. Any assessment must precede the planning decision and where the outcome of the Appropriate Assessment **cannot rule out a potential adverse effect, and no alternative solutions can be identified, then the project can only then proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured** ~~is unfavourable it is unlikely the development would obtain planning consent.~~ As NRW are the conservation body for Wales they would play an integral role in any HRA and would need to be consulted on all applications which would require one.

10.2. Appendix 2 - Map of European Designated Sites

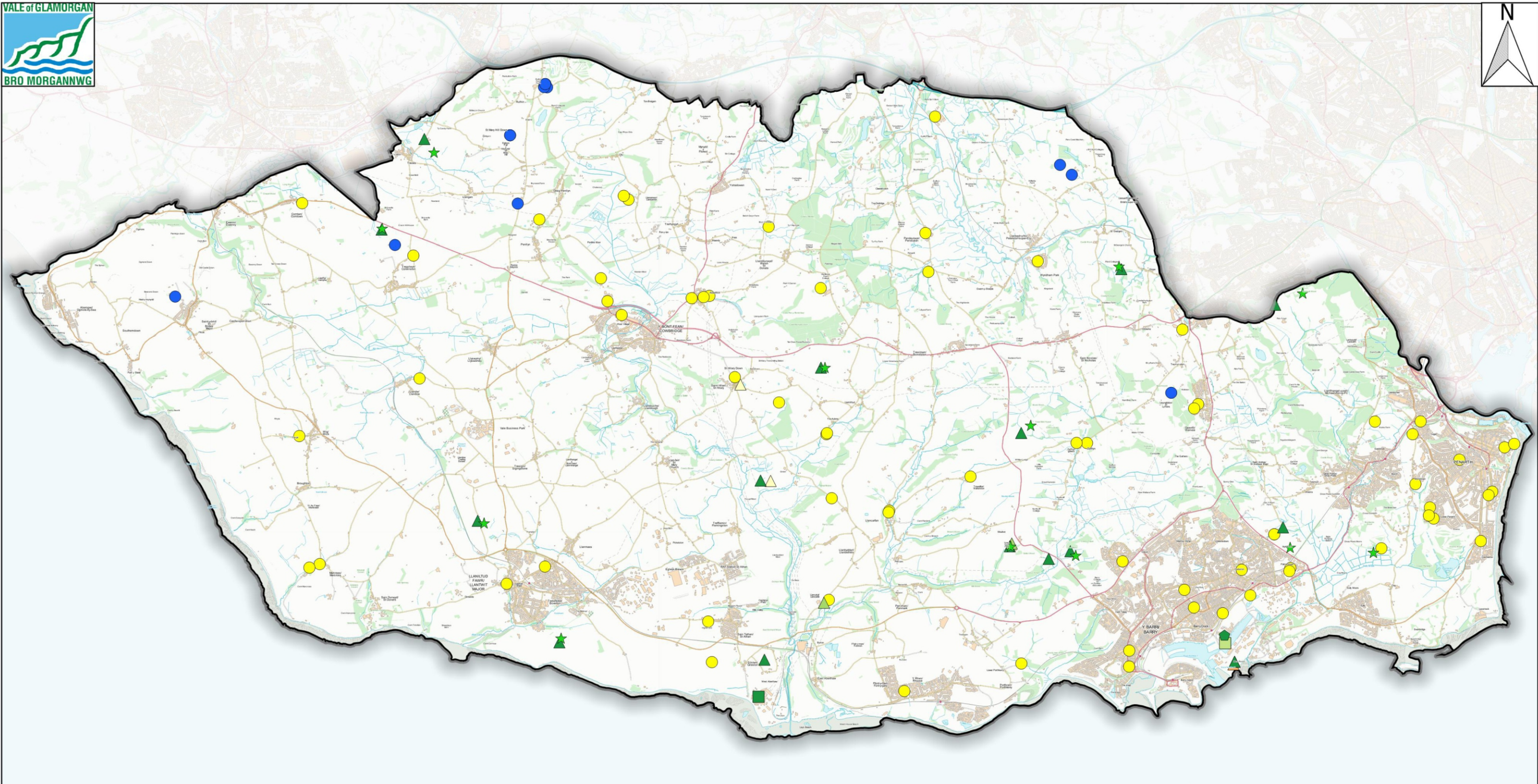


Legend:

-  Vale of Glamorgan Boundary
-  Candidate Special Areas of Conservation (cSAC)
-  RAMSAR
-  Special Areas of Conservation (SAC)
-  Special Protection Area (SPA)

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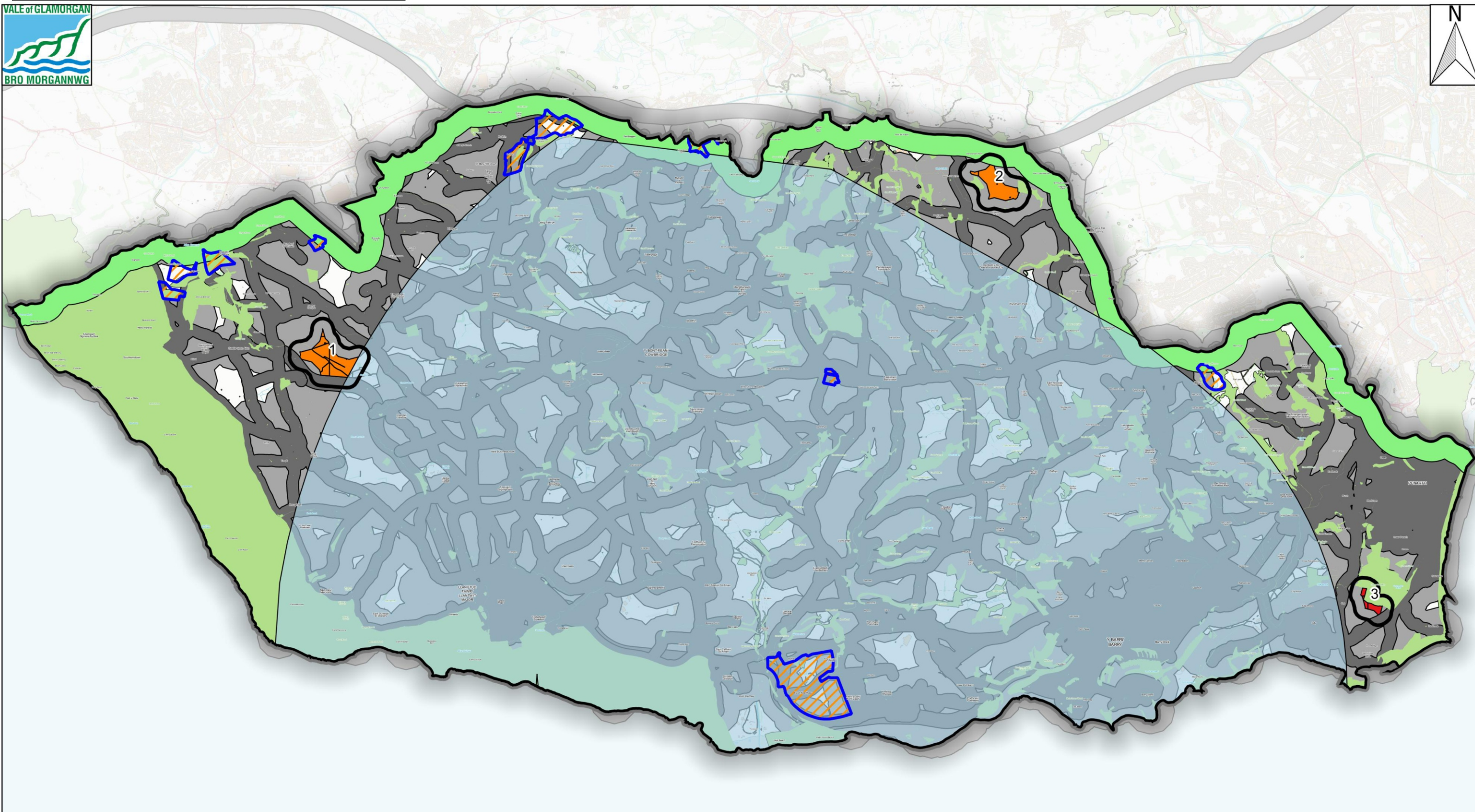
10.3. Appendix 3 - Existing and Proposed Low and Zero Carbon Energy Schemes



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Legend:

Vale of Glamorgan Boundary	Large Scale ACT* Schemes	Large Scale Solar Energy Schemes	Large Scale Biomass Schemes
CHP Schemes	Operational	Abandoned	Abandoned
Domestic Solar Energy Developments Requiring Consent	Planning Permission Refused	Planning Permission Granted	Planning Application Withdrawn
Domestic Wind Energy Developments Requiring Consent	Operational	Operational	



Legend:

Vale of Glamorgan Boundary

Wind Energy Cluster Areas:

Potential Wind Energy Areas Priority 1

Potential Wind Energy Areas Priority 2

Wind Constraints:

Quarries

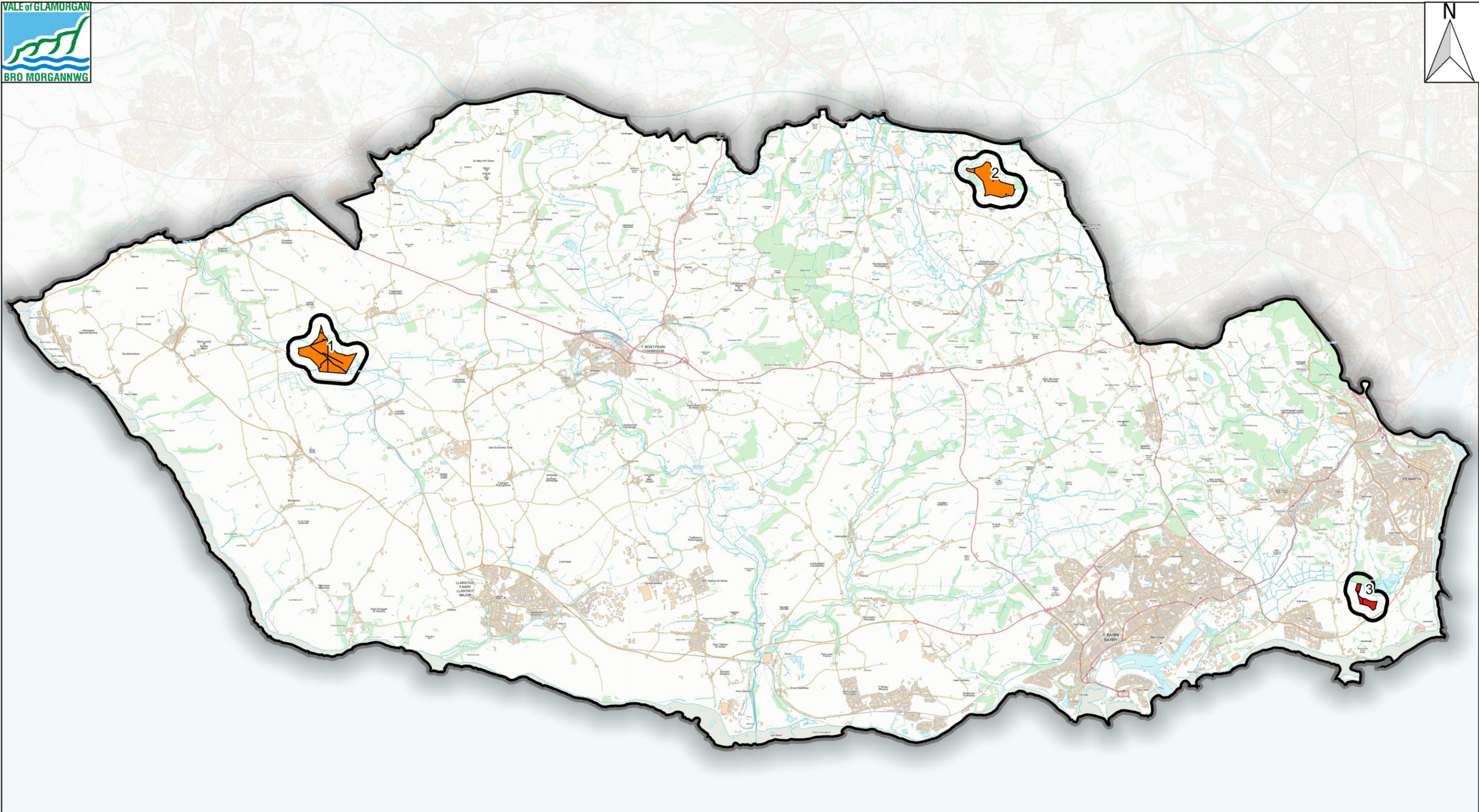
Aviation Constraints

500m VoG Boundary

Heritage and Environmental Constraints

Transport Infrastructure Constraints

Residential 500m Buffer



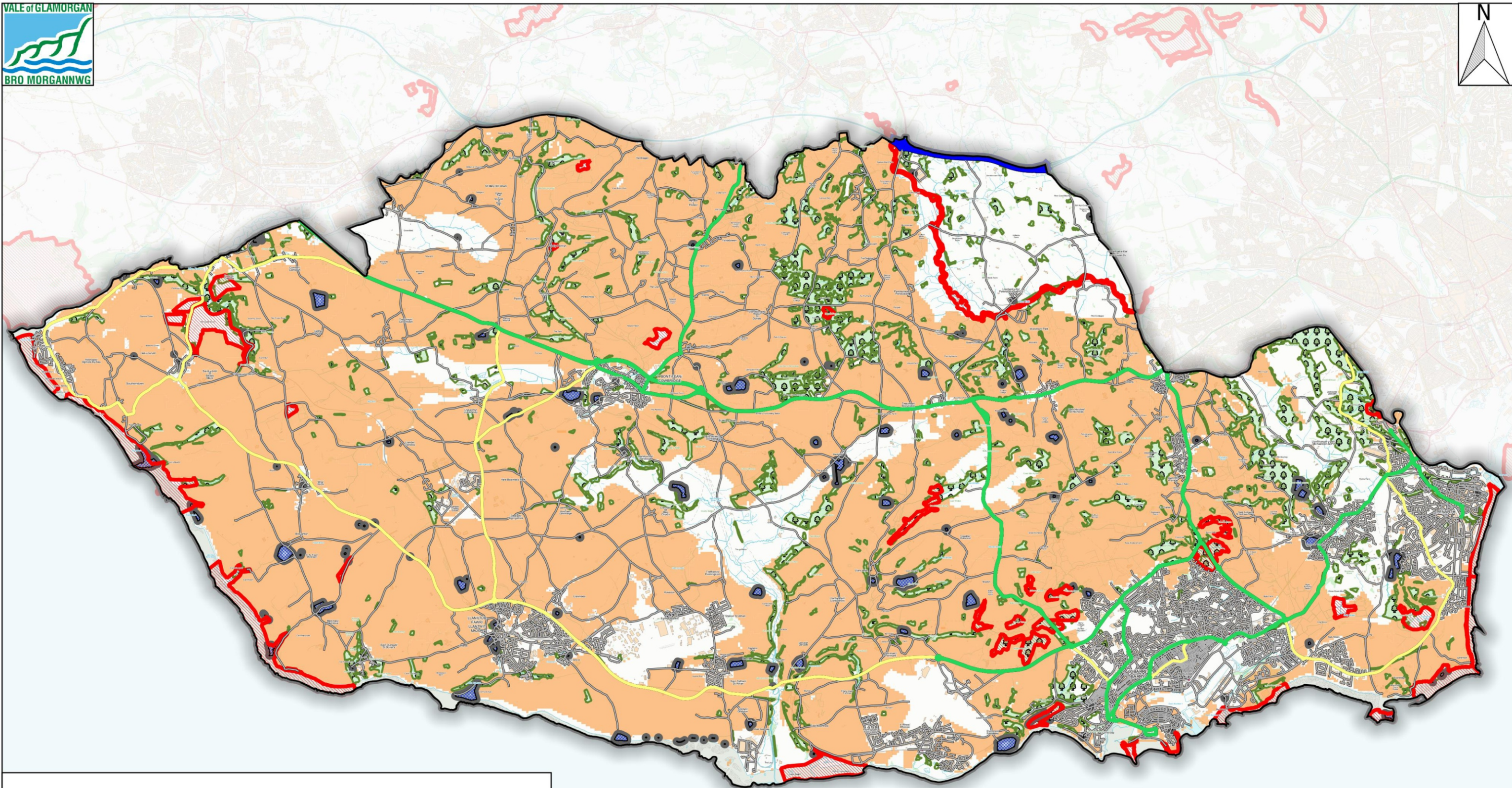
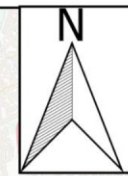
Legend:

 Vale of Glamorgan Boundary

Wind Energy Cluster Areas:

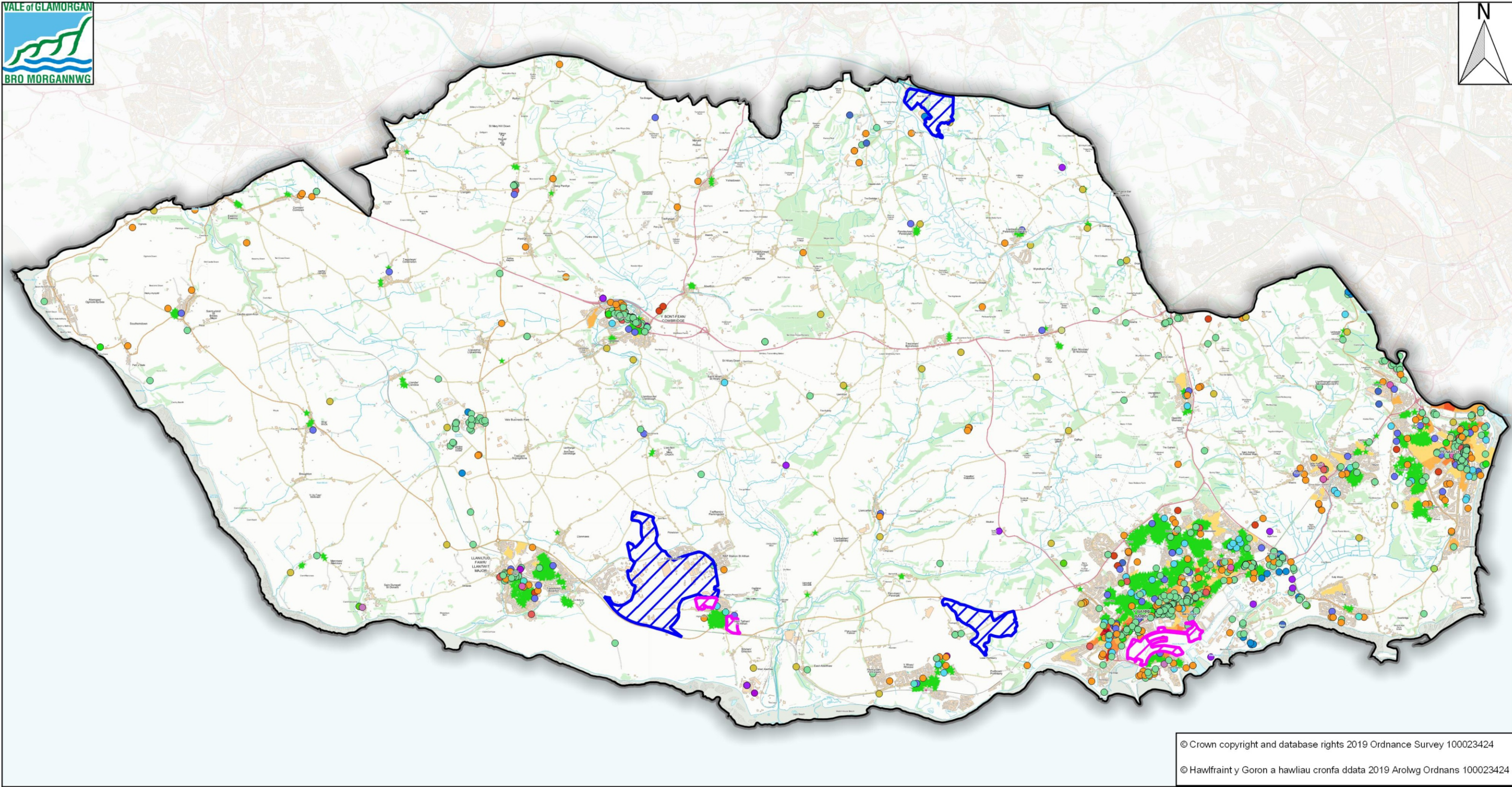
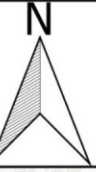
 Potential Wind Energy Areas Priority 1

 Potential Wind Energy Areas Priority 2



Legend:

- | | | |
|------------------|--|------------------------------------|
| Highway Network: | | Vale of Glamorgan Boundary |
| | | SSSI |
| | | Habitat Sites |
| | | Ancient_Monuments |
| | | National Forest Boundaries |
| | | Agricultural Land for Energy Crops |



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Legend

- Vale of Glamorgan Boundary
- Strategic Housing
- Strategic Employment

Potential Heat Anchor Points:

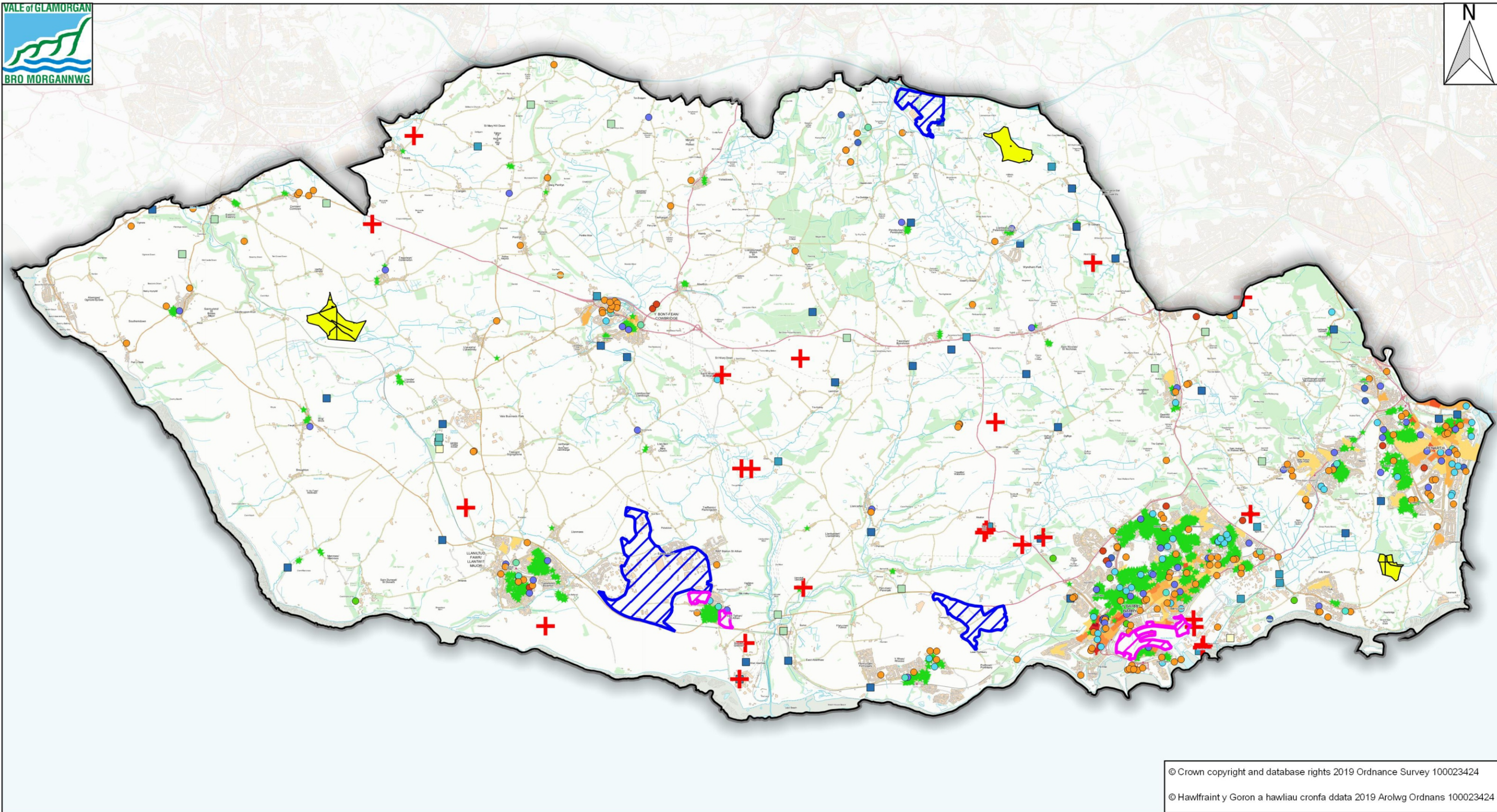
- Community Service Centre / Office
- Colleges
- Primary, Junior, Infants or Middle School
- Secondary School

- Ambulance Station
- Fire Station
- Police Station
- Factory / Manufacturing
- Arena / Stadium
- Bingo Hall / Cinema / Conference / Theatre
- Indoor / Outdoor Leisure / Sporting Activity/ Centre
- Libraries
- Museum / Gallery

- Zoos and theme parks
- Hospital / Hospice
- Offices
- Offices and work studios
- Power stations/energy production
- Water/sewage treatment works
- Care / Nursing Home
- All Social Housing

Residential Heat Density:

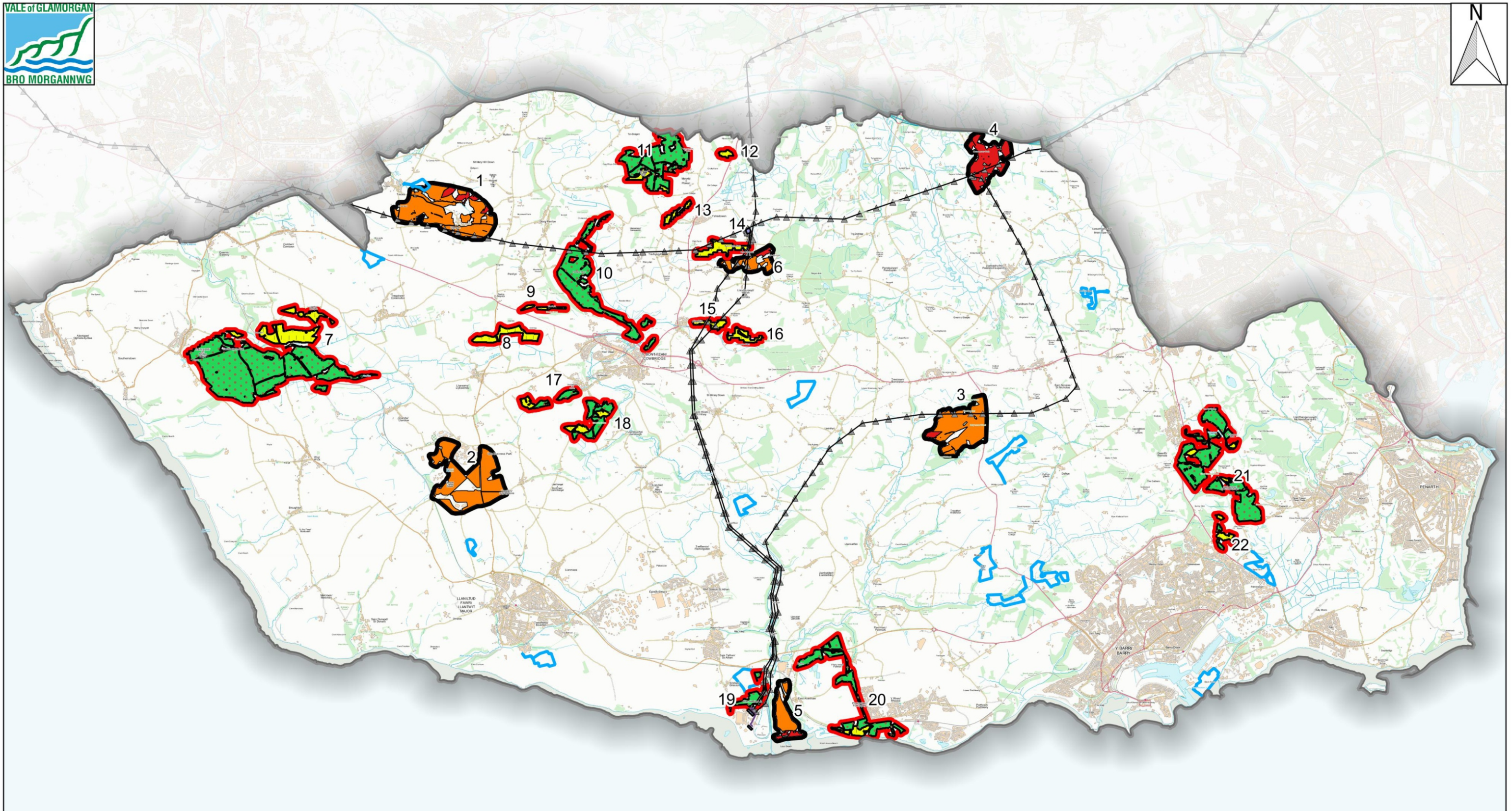
- 0.0 - 3.0 MW per km²
- 3.0 - 4.0 MW per km²
- 4.0 - 5.0 MW per km²
- 5.0 - 6.0 MW per km²
- 6.0 - 7.0 MW per km²
- 7.0 - 8.0 MW per km²
- > 8.0 MW per km²



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Legend

- | | | | |
|--|---|---|--|
| <ul style="list-style-type: none"> Vale of Glamorgan Boundary Strategic Housing Strategic Employment Wind Resource Areas Existing LZC Technologies | <p>Location of Waste Heat Sources:</p> <ul style="list-style-type: none"> Household Waste Recycling Centre Mineral / Ore Working / Quarry / Mine Recycling Plant Power stations/energy production Water/sewage treatment works | <p>Potential Heat Anchor Points:</p> <ul style="list-style-type: none"> Colleges Primary School Secondary School Ambulance Station Arena / Stadium | <p>Potential Heat Anchor Points:</p> <ul style="list-style-type: none"> Leisure Centre Libraries Hospital / Hospice Care / Nursing Home All Social Housing <p>Residential Heat Density:</p> <ul style="list-style-type: none"> 3.0 - 4.0 MW per km² 4.0 - 5.0 MW per km² 5.0 - 6.0 MW per km² 6.0 - 7.0 MW per km² 7.0 - 8.0 MW per km² > 8.0 MW per km² <p>0.0 - 3.0 MW per km²</p> |
|--|---|---|--|



Legend:

Vale of Glamorgan Boundary	Cluster Area	Pylons
Operational Solar Farms	National Grid Data:	Updated Potential Solar Land Areas:
Policy MG30 Potential Solar Energy Areas:	Substations	Solar Land 0 to 3 degrees
Solar Land 0 to 3 Degrees	Cable	Solar Land 3 to 15 degrees
Solar Land 3 to 15 Degress	Over Head Cables	Cluster Area

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10.8. Appendix 8: Landscape and Visual Information required for Wind Turbines

Typology	Study Area	ZTV ¹¹	Visualisations	Cumulative Assessment	Residential Study Area ¹²	Application of LANDMAP Data	Seascape Assessment
Micro <20m	2km	No ¹³	Not required	Location plan Written assessment	10 x the height to the blade tip	Identification of Aspect Areas within study area.	Where the ZTV for the study area Extends across coastal areas the Seascape Assessment of Wales (CCW 2009) and any other local seascape assessments should be taken into account.
Small <20m (1 turbine)	5km	Yes	3-5 visualisations. If EIA is required the location and number of visualisations will be agreed in scoping. Wirelines without photomontages may be acceptable.	Location plan. Cumulative ZTV may be required. Cumulative wirelines / photomontages may be required. Written assessment.	10 x the height to the blade tip	All aspect areas affected by the footprint of the development should be considered in detail. Aspect areas outside the site should be considered in line with LANDMAP Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Assessment of Onshore Wind Turbines. (See Part 3: Section C of this guidance).	
Medium <65m (4 turbines or less)	8km	Yes	5-7 visualisations. If EIA is required the location and number of visualisations will be agreed in scoping. Wirelines without photomontages may be acceptable.	Location plan. Cumulative ZTV likely to be required. Cumulative wirelines / photomontages likely to be required. Written assessment.	10 x the height to the blade tip	LANDMAP Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Assessment of Onshore Wind Turbines. (See Part 3: Section C of this guidance).	
Large <135m (5 turbines or less)	11km	Yes	The location and number of visualisations will be agreed in scoping. Photomontages and wirelines required.	Location plan. Cumulative ZTV Cumulative wirelines / photomontages required. Full CLVIA.	10 x the height to the blade tip	LANDMAP Guidance Note 3: Using LANDMAP for Landscape and Visual Impact Assessment of Onshore Wind Turbines provides more detailed guidance.	
Very Large ≥135m (6 turbines or more)	15km	Yes	The location and number of visualisations will be agreed in scoping. Photomontages and wirelines.	Location plan. Cumulative ZTV. Cumulative wirelines / photomontages. Full CLVIA.	10 x the height to the blade tip		

¹¹ Zone of Theoretical Visibility (ZTV) – A computer generated plan which shows the visibility of the turbines in the surrounding landscape.

¹² This is the area which a residential amenity assessment should be undertaken.

¹³ A ZTV will be required where a micro scheme is within 10x blade tip height of statutorily designated landscapes.



The Vale of Glamorgan Council
**Directorate of Regeneration and
Planning**
Dock Office
Barry Docks
Barry Cf63 4RT

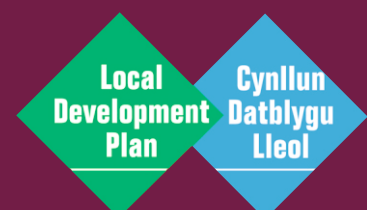
LDP@valeofglamorgan.gov.uk
www.valeofglamorgan.gov.uk

Parking Standards



Supplementary
Planning Guidance

March 2019



Parking Standards

~~Draft~~ Supplementary Planning Guidance

This document is available in other formats upon request e.g. larger font.
Please see contact details in Section 9.

Contents

1. Introduction	1
2. Purpose of the Supplementary Planning Guidance	2
3. Status of the Guidance	3
4. Legislative and Policy Context.....	4
5. Application of Parking Standards for the Vale of Glamorgan	11
6. Parking Zone Designation	14
7. Infrastructure for Ultra Low Emission Vehicle Charging Points	17
8. Car parking for people with disabilities	20
9. Further Advice and Contacts	21
10. Parking Standards by Land Use	22
11. Appendices.....	38
11.1. Appendix 1: Access for The Disabled Guidance Notes For Applicants.....	38
11.2. Appendix 2 – Layout of Parking Areas	43
11.3. Appendix 3 Landscaping.....	45
11.4. Appendix 4 Cycle Parking Standards.....	46
11.5. Appendix 5 Motorcycle Parking Standards.....	49
12. Definitions and Notes.....	50

1. Introduction

- 1.1. Car parking is a major influence on the choice of means of transport and the pattern of new development. If car parking is readily available people are more likely to opt to use the private car instead of more sustainable forms of transport. Car parking has always been a major element of land use planning and development and through parking standards and guidelines, local authorities have sought to control car parking in order to improve the environment, reduce congestion and to encourage a shift to more sustainable modes of transport.
- 1.2. In 2008 an officer working group representing the 22 local authorities in Wales prepared the Wales Parking Standards on behalf of the County Surveyors Society (CSS) Wales. The CSS Wales Parking Standards 2008 were endorsed by the then four regional transport consortia and the majority of Welsh local authorities including the Vale of Glamorgan Council. The main aims of the 2008 CSS standards were:
 - To assist developers, designers and builders in the preparation and submission of planning applications; and
 - To achieve a common approach to the provision of vehicle parking facilities associated with new development and change of use.
- 1.3. The 2008 CSS standards recommended that ‘maximum’ car parking standards should be used as a form of demand management and that in determining appropriate levels of car parking associated with new developments, consideration should be given to the availability of more sustainable modes of transport that could influence and reduce the use of the private car.
- 1.4. Parking guidelines based on the 2008 CSS standards were formally adopted by the Vale of Glamorgan Council as Supplementary Planning Guidance (SPG) on the 11th May 2015 (Minute No. C2769 refers). On the 28th June 2017 the Council adopted the Vale of Glamorgan Local Development Plan 2011- 2026. This Parking Standards SPG has therefore been updated to reflect the latest national and local planning policies, whilst using the 2008 CSS standards as a basis for parking standards associated with new developments.

2. Purpose of the Supplementary Planning Guidance

- 2.1. This SPG has been prepared to expand upon the policies contained within the Vale of Glamorgan Local Development Plan 2011 – 2026 (LDP) and reflects the requirement set out in Planning Policy Wales ~~(Edition 9) (November 2016)~~ **(Edition 10) (December 2018)** for local authorities to adopt parking standards as SPG and keep them under review **(para 4.1.53 refers)**.
- 2.2. The guidance sets out the Council's parking standards for new development (including change of use) that are both consistent and transparent. Parking requirements are detailed according to land use and location and list requirements for commercial vehicles, cars, motor cycles and cycles.
- 2.3. The guidance also provides information in respect of how the preparation and adoption of travel plans and/or the location of the proposed development in relation to alternative sustainable modes of transport and local services and facilities may be taken into account in the level of parking provision required.
- 2.4. The SPG also includes information on the Council's requirements in relation to the provision of infrastructure for Ultra Low Emission Vehicles (ULEVs).

3. Status of the Guidance

~~3.1 This guidance was approved by Cabinet as a draft for public consultation on XXXXXX (Minute No. XXX refers). The Council will consider the representations received during the consultation exercise before finalising the document for development management purposes.~~

~~3.2 Planning Policy Wales (PPW) advises that SPG may be taken into account as a material consideration where it has been prepared in consultation with the general public and interested parties and is consistent with the development plan. Once adopted, the SPG will be a material consideration in the determination of planning applications and appeals in the Vale of Glamorgan.~~

3.1. **Draft guidance was approved for public consultation purposes by Cabinet on 3rd December 2018 (minute no. C502 refers). A six week public consultation was subsequently held between 4th January 2019 and 15th February 2019. The relevant documentation was made available for viewing at the Council's main offices and on the web site during the consultation period.**

3.2. **The Council considered the representations received and made changes where appropriate. This SPG was approved by Cabinet on x x 2019 (minute no. x refers) and will be a material consideration in the determination of relevant planning applications and appeals.**

4. Legislative and Policy Context

4.1. National Legislation

- 4.1.1. **The Planning (Wales) Act 2015** - seeks to deliver a planning system which is fair, resilient, enables development and helps create sustainable places.
- 4.1.2. **Well-Being of Future Generations (Wales) Act 2015** - seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act contains seven well-being goals which local authorities as well as other public bodies must seek to achieve in order to improve well-being both now and in the future. It means that for the first time, public bodies listed in the Act must do what they do in a sustainable way and make sure that when making their decisions they take into account the impact they could have on people living their lives in Wales in the future.
- 4.1.3. **Active Travel (Wales) Act 2013** - seeks to make it easier for people to walk and cycle in Wales. The Act makes it a legal requirement for local authorities in Wales to map and plan for suitable routes for active travel, and to build and improve their infrastructure for walking and cycling every year. It creates new duties for highways authorities to consider the needs of walkers and cyclists and make better provision for them. It also requires both the Welsh Government and local authorities to promote walking and cycling as a mode of transport.

4.2. National Policy

- 4.2.1. **Planning Policy Wales (~~Edition 9~~) (Edition 10)** - Planning Policy Wales (PPW) **sets out the Welsh Governments aims and objectives of land use planning within Wales across a range of social, environmental and economic topics, and indicates that the planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly (Paragraph 2.3 refers). PPW also translates the national well-being goals into 5 planning principles – Growing Our Economy in a Sustainable Manner; Making Best Use of Resources; Facilitating Accessible and Healthy Environments; Creating and Sustaining Communities, and Maximising Environmental Protection and Limiting Environmental Impact. PPW is supplemented by a series of Technical Advice Notes (TANs).**
- 4.2.2. ~~out the land use planning policies of the Welsh Government~~ Paragraph ~~8.4.1~~ **4.1.46** states that in considering their requirements for traffic management, local authorities should adopt an integrated approach and consider how different measures can complement one another and contribute to the achievement of wider planning and transport objectives, taking into account the needs of the disabled and less mobile sections of the community. **Paragraph 4.1.19 also**

states that the design and layout of streets must reflect the principles of the sustainable transport hierarchy and ~~Within town centres priority should be given to walking, cycling, public transport and delivery vehicles, through the reallocation of road space.~~

- 4.2.3. Paragraph **4.1.50** ~~8.4.2~~ states: Car parking provision is a major influence **on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place.** ~~the choice of means of transport and the pattern of development.~~ **Paragraph 4.1.53 states that Local authorities will need to ensure that their parking standards reflect local transport provision, are adopted by individual authorities as supplementary planning guidance, and are kept under review. Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high quality places.** ~~Local Authorities should ensure that new developments provide lower levels of parking than have generally been achieved in the past. Minimum parking standards are no longer appropriate.~~
- 4.2.4. ~~Draft Planning Policy Wales Edition 10 (Consultation Draft 2018)~~ In addition to ~~the existing advice on parking set out above, draft edition 10 PPW recognises the role of electric vehicles. It states that to encourage the use of Ultra Low Emission Vehicles (ULEVs), the planning system should~~ **encourage and support the provision of ULEV charging points as part of new development (paragraph 4.1.39 refers).** ~~ensure new development incorporates ULEV charging infrastructure. This infrastructure should be provided at homes, workplaces and key destinations, such as supermarkets, retail and commercial centres and leisure facilities and that planning authorities should require a minimum of 10% on non-residential car parking spaces to have ULEV charging points although it may be appropriate for some of this provision to be ‘passive’ with the necessary underlying infrastructure provided to enable simple installation and activation in the future, or to secure a financial contribution through S106 agreement towards the off-site provision of ULEV charging infrastructure (paragraphs 3.146 and 3.147 refer).~~
- 4.2.5. **Technical Advice Note 12: Design (2016)** - provides additional guidance and advice on enabling good design within the planning system. It recognises that parking is a consideration in design and developments should consider the requirements for parking and whether this will be managed appropriately. At paragraph 5.11.2 it states: Development proposals, in relation to housing design should aim to [inter alia] focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles.
- 4.2.6. Paragraph 5.11.7 states: Where and how cars are parked can be a major factor in the quality of a development. Vehicles should not be allowed to dominate the space or inconvenience pedestrians and cyclists. At the same time, the needs of disabled people to park near their dwellings should be acknowledged. A balance needs to be struck between the expectations of car owners, in particular the

desire to park as near to houses as possible, to be secure and overlooked and the need to maintain the character of the development.

- 4.2.7. **Technical Advice Note 18: Transport (March 2007)** - provides guidance on achieving a sustainable and integrated land use planning and transport system. Paragraph 4.1 states: Car parking can take up large amounts of space in developments, which decreases density and therefore can represent an inefficient use of land. It can also generate considerable additional trips if located in an area without public transport. Poor design and layout of car parking can also make it more difficult to provide effective, walking, cycling and public transport links.
- 4.2.8. The TAN makes it clear that maximum rather than minimum parking standards should be adopted. Paragraph 4.7 states: “In determining maximum car parking standards for new development, regard should be given to:
- Public transport accessibility and opportunities or proposals for enhancement;
 - Targets and opportunities for walking and cycling;
 - Objectives for economic development including tourism;
 - The availability in the general area of safe public on-and off-street parking provision; and
 - Potential for neighbouring or mixed use developments sharing parking spaces, for example at different times of the day or week”.
- 4.2.9. Paragraph 4.13 states: Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes. Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels. However, a particular concern with reduced on-site parking is the potential for problems associated with ‘over-spill’ parking. Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the impact of new development. Where on street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of on-street parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.
- 4.2.10. Paragraph 4.15 of the TAN in relation to residential car parking states some car free housing development may be appropriate in locations with good walking, cycling and public transport links and in areas where parking is controlled. On-site cycle and parking provision for those with disabilities will be required if such on-street parking cannot be provided. Planning obligations will have a role to play in ensuring residents do not own cars in such developments. In such cases, it is essential that, prior to occupation, the future residents should be made aware of the car free status of the development and the use of travel planning initiatives should be encouraged.

- 4.2.11. Paragraph 4.16 states: Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.
- 4.2.12. Paragraph 5.13 states: The location of both on- and off-street car parking spaces will be critical to the design quality of streets. Where on-street car parking is not controlled planning authorities should recognise that residents will seek to park as close to their homes as possible and should ensure the street layout mitigates against inappropriate parking and avoids the obstruction of pedestrians or emergency access. The following key principles need to be followed when considering the design and location of car parking:
- The important role of the street in creating a liveable neighbourhood;
 - There is no single best solution; a combination of onplot, off-plot and on-street will often be appropriate;
 - The street can provide a very good car park. On-street parking is efficient, understandable and can increase vitality and reduce speeds;
 - Parking in the back of a block is recommended only the after provision of parking at the front and on street has been fully considered. Rear courtyards need to support on-street parking, not replace it; and
 - Car parking needs to be designed with security in mind. Advice on this issue is contained in 'Safer Places'.
- 4.2.13. **Manual for Streets (MfS) (2007)** recognises that parking is a key function of many streets, although it is not always a requirement. A well-designed arrangement of on-street parking provides convenient access to frontages and can add to the vitality of a street. Conversely, poorly designed parking can create safety problems and reduce the visual quality of a street. Chapter 8 considers the parking requirements associated with new development and advises that while the greatest demand is for parking cars, there is also a need to consider the parking of cycles, motorcycles and in some instances service vehicles.
- 4.2.14. It provides advice on safety and security of car parking: cars are less prone to damage or theft if parked in-curtilage. If cars cannot be parked in-curtilage, they should ideally be parked on the street in view of the home. Where parking courts are used, they should be small and have natural surveillance.
- 4.2.15. Paragraph 8.3.5 states: Local planning authorities will need to consider carefully what is an appropriate level of car parking provision. In particular, under-provision may be unattractive to some potential occupiers and could, over time, result in the conversion of front gardens to parking areas (see box). This can cause significant loss of visual quality and increase rainwater run-off, which works against the need to combat climate change.
- 4.2.16. MfS also provides advice about suitable parking layouts. It states that larger garages can be used for both storage and car parking, and many authorities now

recommend a minimum size of 6 m by 3 m. It advises parking bays will need to enclose a rectangular area about 2.4 m wide and a minimum of 4.2 m long.

- 4.2.17. **Manual for Streets 2 (2010)** provided more technical advice on the application of MfS principles.

4.3. Local Policy Context

- 4.3.1. **Vale of Glamorgan Local Development Plan 2011- 2026 (LDP)** - The overarching strategy of the Vale of Glamorgan LDP focusses future development within the south-east zone and existing settlements where the majority of services and sustainable transport facilities are located. In addition, the following objectives and policies seek to ensure that the plan fosters a sustainable future which manages the natural and built resources of the Vale of Glamorgan and makes a positive contribution towards reducing the impact of climate change by promoting sustainable development and transport, energy conservation and renewable energy generation.

Objective 2 - To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change.

Objective 3 - To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

- 4.3.2. The objectives of the LDP are supported by strategic policies and managing development polices and those relevant to parking include:

Policy SP1 - Delivering the Strategy - seeks to improve the living and working environment of the Vale of Glamorgan through inter alia promoting sustainable transport.

Policy SP7 - Transportation - promotes sustainable transport improvements that serve the economic, social and environmental needs of the Vale of Glamorgan, including the national cycle network, bus based park and ride and bus priority improvements as reflected in Policy MG 16 – Transport Proposals.

Policy MD1 - Location of Development - provides the framework for new development on unallocated sites and seeks to ensure that such development reinforces the role of settlements within the hierarchy and promotes the use of sustainable modes of transport.

Policy MD2 - Design of New Development - sets out the key principles that should be considered in respect of design, amenity and access. It requires development proposals to provide safe and accessible environments for all users, giving priority to pedestrians, cyclists and public transport users and

provide car parking in accordance with the Council's standards. This SPG sets out those standards.

Policy MD4 - Community Infrastructure and Planning Obligations - seeks to secure new and improved community facilities and services appropriate to the scale, type and location of proposed new developments including transport infrastructure and services for pedestrians, cyclists, public transport and vehicular traffic.

Policy MD5 – Development Within Settlement Boundaries – sets criteria for these developments, stating that proposals will be permitted where (amongst other things) they have no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking.

- 4.3.3. It should be noted that the policies detailed above comprise the primary policies of the Vale of Glamorgan LDP relating to sustainable transport, parking and movements however other policies of the plan may also have a bearing on such matters and be utilised in the Council's determination of future planning applications.
- 4.3.4. **The Local Transport Plan 2015 – 2030 (LTP)** - The LTP sets the transport agenda for the Vale of Glamorgan, by identifying the sustainable transport measures required for the period 2015 to 2020 as well as looking forward to 2030. The LTP seeks ways to secure better conditions for pedestrians, cyclists and public transport users and to encourage a change in travel choices away from the single occupancy car. The LTP also seeks to tackle traffic congestion by securing improvements to the strategic highway corridors for commuters who may need to travel by car as well as providing better infrastructure for freight. It also addresses the key road safety priorities for the Vale.
- 4.3.5. National and local policy has therefore seen a fundamental departure from predicting and providing for private cars and a move towards managing traffic and reducing the dependency on the private vehicles.

4.4. Supplementary Planning Guidance

- 4.4.1. **Planning Obligations SPG** – The Planning Obligations SPG, provides clarification of where, what, when and how planning obligations will be sought, in order to assist the Council in creating sustainable communities that provide social, economic, and environmental benefits. This guidance offers advice on planning obligations in support of the policies in the Vale of Glamorgan LDP, including planning obligation requirements for sustainable transport facilities that will assist in delivering successful Travel Plans that can influence parking demand.

- 4.4.2. **Travel Plan SPG** – This SPG sets out the Council’s requirements for Travel Plans in order to reduce the reliance on the private car and encourage a move to more sustainable modes of transport.

- 4.4.3. **Residential and Householder Development SPG** – This SPG provides advice on what matters must be considered when designing new residential development or improvements or alterations to your home, preparing plans and submitting planning applications. The SPG provides guidance on the main issues arising from new householder development; provides a number of standards that should be complied with in order to safeguard residential amenity; sets out a series of principles to be followed to ensure good design; and provides possible solutions to certain design issues encountered.

5. Application of Parking Standards for the Vale of Glamorgan

- 5.1. In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures. Car parking provision is a major influence on the choice of means of transport and the pattern of development. **Where and how cars are parked can be a major factor in the quality of a place and PPW directs that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them (paragraph 4.1.51 refers).** ~~We need to ensure that new developments provide lower levels of parking than have generally been achieved in the past and minimum parking standards are no longer appropriate (PPW paragraph 8.4.2 refers).~~
- 5.2. It is considered that using maximum standards which limit the amount of parking provided on developments can help focus attention on the overall travel context of a development including the availability of more sustainable modes of transport such as public transport, walking or cycling. Such an approach will enable more flexibility to the application of the parking standards (where supported by appropriate and robust evidence) to reflect local conditions and the availability of alternative forms of transport and may result in a reduction in the level of vehicle parking required.
- 5.3. In assessing the parking requirements for a particular development, the Council will take into account a number of factors in relation to the development and its location. These could include:
- Accessibility to and the service provided by public transport;
 - The availability of private buses, taxi services or the extent of car-pooling;
 - The relative proportions of full time / part time / local catchment of labour;
 - Accessibility by walking and cycling to every day goods and services;
 - The existing and possible future parking provision, traffic volumes and congestion on streets adjacent to the development;
 - Potential impacts on highway / public safety;
 - Accessibility to and the availability of public and/or private car parking spaces in the vicinity.
 - **The production of an agreed Travel Plan, supported by appropriate financial investment and staff commitment.**

- 5.4. The parking standards cover all areas in the Vale of Glamorgan but apply to designated zones (as set out in Section 6 below). Whilst they should not be applied as minimum standards (following the advice in PPW) they suggest the starting point for considering the necessary level of parking to serve new developments. If satisfied these developments are unlikely to cause highway safety problems associated with inconsiderate parking or contribute towards issues such as congestion. Where they are not met, consideration will need to be given to whether it is justified in light of other considerations (see paragraph 5.3 above) and whether there are likely to be problems associated with a lack of designated parking spaces in the vicinity of the development for existing communities and the future users of the development. Where these problems would occur from a lack of adequate parking, planning permission may be refused as the development would be contrary to LDP Policy MD2.
- 5.5. Whilst there is a desire to reduce the reliance upon the private car, it is anticipated that, in most cases, there will be a need to accommodate parking provision for cars within residential developments. There is the potential for a reduction in residential parking levels particularly if the property is in close proximity to local community facilities, public car parks, is well served by public transport and/or there is evidence of low car ownership. Care should be taken however to avoid reductions that will potentially create highway safety issues and consideration must be given to local circumstances e.g. road widths, local on-street parking demand, proximity to turning heads or bus stops etc. These matters need to be considered on a case by case basis.
- 5.6. There may be some instances where reduced or zero parking is acceptable, for instance, where developments are in highly accessible locations served by a range of public transport options and/or it can be demonstrated that there is low parking demand. However, these proposals would need to be supported by robust evidence which fully justifies why a reduced or zero level of provision would be acceptable. Such evidence could include but is not restricted to local parking surveys, comparative assessments with existing / previous uses, likely car ownership evidence for future occupiers, travel plan strategies etc.
- 5.7. Where a car parking survey is required it should establish the existing parking demand within the local area of a proposed development using on-site assessments / observations. In order to obtain a true reflection of the existing local car parking arrangements, site surveys should be undertaken over a period of at least one week including both weekends and weekdays at a variety of times throughout the day relevant to the nature of the use proposed including peak times, late in the evening and early in the morning. Times where unusually high or low parking demand is being experienced which is outside the norm (e.g. School holidays, bank holidays or special events) should be avoided.
- 5.8. It will often be relevant to take into account the existing or previous use (or uses that could result from a 'permitted' change of use) and the parking requirements associated with it, together with an analysis of the actual provision for that use. If the parking serving the existing use is already lower than the parking standards,

this can be a material consideration justifying a reduced level of parking where there is no additional detriment compared to the existing situation. **However, if sites have been vacant or uses abandoned this ‘fall-back’ position will have limited weight in assessing parking demand for new development.**

- 5.9. New residential layout design, as advocated by Manual for Streets, can create areas of unallocated parking which can supplement those areas of allocated off-street provision i.e. driveways, garages. A parking requirement for a particular property can count both off-street allocated space and unallocated on-street space provided there is a realistic chance the latter will be used and its use will not create obstruction or congestion for other road users. For the purpose of this document, a standard parking space is considered to be 2.6 m x 4.8 m however, sufficient space must be available around this area to enable safe and convenient access to vehicles. Specific details in relation to disabled parking space requirements are provided in Appendix 1 All parking areas other than residential parking areas served off low-trafficked, low speed, minor residential roads should be designed to allow vehicles to enter and leave the site in forward gear.
- 5.10. Travel plans will be required as a condition of planning consent for those development proposals that are likely to have significant transport implications. More details on travel plans, their benefits and what information they should include are available in the Councils Supplementary Planning Guidance on Travel Plans.
- 5.11. In certain circumstances, e.g. Conservation Areas, modifications of the standards may be allowed in order to preserve environmental conditions.
- 5.12. **All car parking should be designed with security in mind and all parking and cycle stands should be positioned where they can be well overlooked with adequate street lighting provision to enhance personal safety and prevent crime. Further advice on design and layout of parking including secure cycle storage can be obtained from police Design Out Crime Officer or www.securedbydesign.com**

6. Parking Zone Designation

- 6.1.1. The 2008 CSS Wales Parking Standards defined six parking zones each with differing designated levels of parking requirements for development management purposes. The distinction between each of the zones was largely based on the varying levels of accessibility to services and facilities within that zone. The zone descriptions, and therefore parking requirements, ranged from Zone 1 – City Centre, which is applicable only where there are very high levels of accessibility to all services (NB there are none in the Vale of Glamorgan), to Zone 6 – Deep Rural, which is applicable to rural, countryside locations with low levels of accessibility. These have been used and re-categorised, removing Zone 1, for the Vale of Glamorgan – see below.
- 6.1.2. The designation of the parking zones within the Vale of Glamorgan have been based on the zone descriptions contained within the CSS Parking Standards and the parking zones have been determined through a judgement of each area in terms of:
- a) The number, range and characteristics of the facilities within walking distance;
 - b) The level of public transport provision and particularly the number and frequency of bus services available.
- 6.1.3. In addition to the above, information prepared in support of the LDP including the Council's Sustainable Settlements Appraisal, settlement boundary designations and district shopping centre boundaries influenced the parking zone boundaries.
- 6.1.4. **Plan 1** illustrates the five Parking Zones within the Vale of Glamorgan and the zone descriptions are set out below. Individual Parking Zones are best viewed using the interactive map found at:
- https://myvale.valeofglamorgan.gov.uk/ParkingZones_FullScreen.html**
- 6.1.5. The parking zones identified in this SPG may be subject to amendments as new development may introduce elements such as additional community facilities or improved public transport facilities that necessitate the redefining of the identified parking zones.

6.2. Parking Zones

Zone A - Town Centre

The centre of towns which local people regard as their destination for most activity which is not met within their own local community. The area has a full range of retail activity and many commercial businesses, all within walking distance. The area is the focus of the local bus network and is likely to contain a railway station. Built density is high with little private car parking. There are significant parking restrictions and substantial amounts of off-street car parking available to the public.

Zone B - Urban

Very much part of a substantial built up area with a number of basic local facilities within 400m walking distance. A range of bus routes offering up to 6 buses per hour; the range of destinations offering practical access to most but not all essential facilities. The curtilage of the site restricts, to an extent, what car parking can be provided. There are likely to be some restrictions on on-street parking and other available off-street parking is severely limited or non-existent.

Zone C - Suburban or Near Urban.

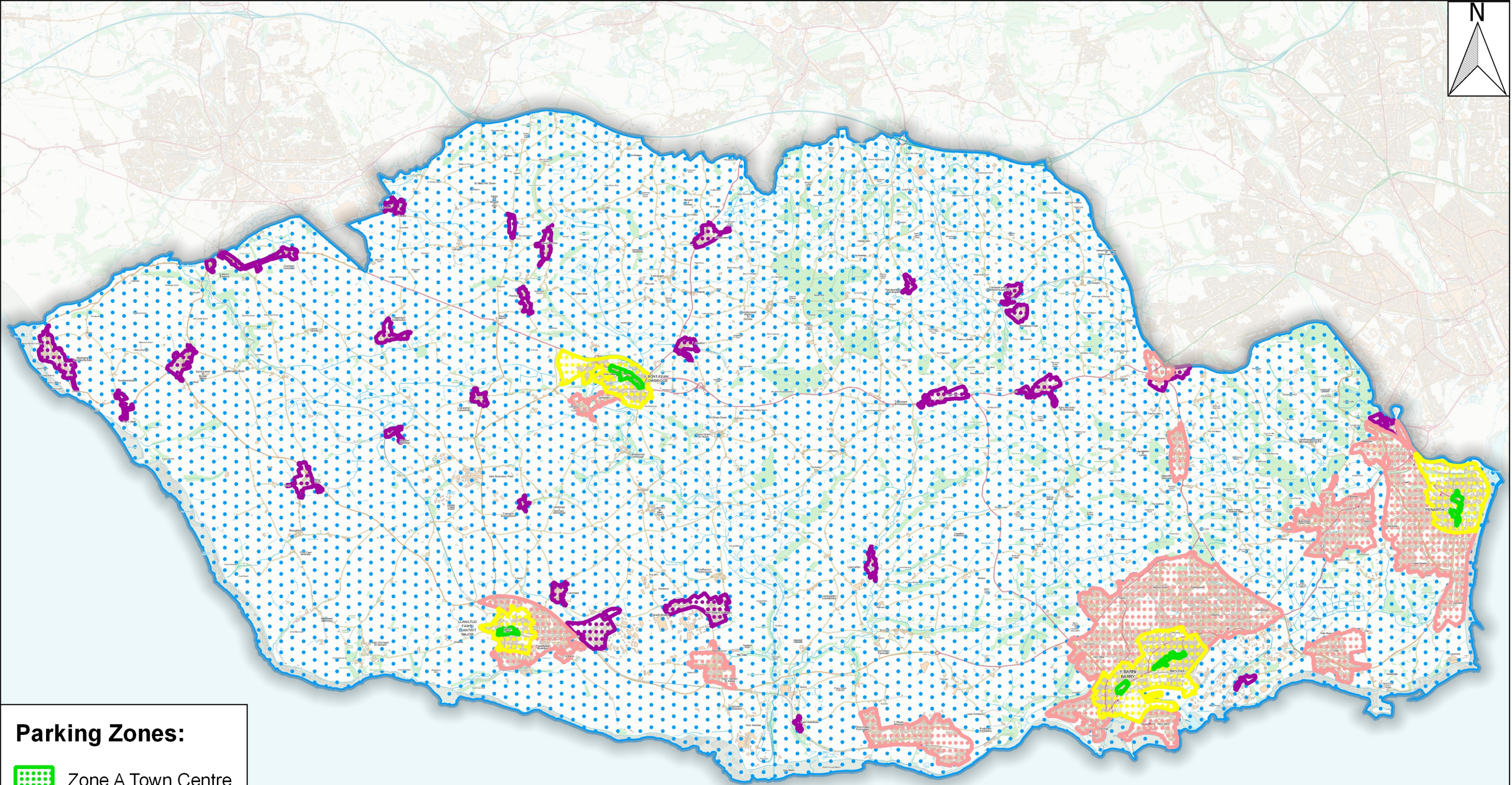
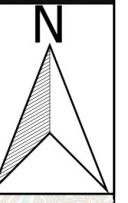
This zone comprises the outer edges of the largest towns; suburban locations in towns; the whole of smaller settlements offering a range of local facilities. There is an at least hourly bus service to the town centre and there may also be a railway station in the town. Local facilities include a local centre within 400m walking distance. Some other basic amenities such as a doctor's surgery are also available within the same walking distance.

Zone D - Countryside.






Zone D encompasses areas, including small villages, with a few local facilities within walking distance. Motorised travel is required for most journeys, although there is some local employment. Public transport services have less than hourly frequency and then only to one local centre. There is no shortage of land for parking provision within the site but the adjacent highway system offers limited opportunities to park cars.

Zone E - Deep Rural.

This zone comprises scattered individual buildings and is characterised by areas with no local facilities within walking distance. Motorised travel is required for all journeys but the most local. Public transport services are very infrequent or beyond walking distance. There is no shortage of land for parking provision within the site but the adjacent highway system offers no opportunities to park cars because of the narrowness of the highway.



Parking Zones:

-  Zone A Town Centre
-  Zone B Urban
-  Zone C Suburban
-  Zone D Countryside
-  Zone E Deep Rural

7. Infrastructure for Ultra Low Emission Vehicle Charging Points

- 7.1.1. The Vale of Glamorgan Council is aware of its environmental responsibilities and the contributions that it can make to mitigating the causes of climate change, improving local air quality and to meeting the objectives of the Welsh Government as expressed in the Well-being of Future Generations (Wales) Act 2015. In this regard, the Council's Local Development Plan contains policies that require the promotion of sustainable transport and healthy environments and the mitigation of climate change.
- 7.1.2. The Council recognises that Ultra Low Emission Vehicles and Plug-In Hybrid Vehicles (ULEVs and PHEVs) currently constitute a relatively small proportion of vehicles on our roads. However advances in technology have resulted in increased popularity in electric vehicles and it is anticipated that as technology and government initiatives develop, their use and popularity will increase further.
- 7.1.3. In a bid to improve air quality through reduced car emissions, the UK Government has confirmed that it will end the sale of all new conventional petrol and diesel cars and vans by 2040.
- 7.1.4. Therefore, to encourage the take up of these vehicles and increase the number and geographic spread of ULEV charging infrastructure, the Council will seek to secure the necessary electric vehicle charging points (EVCPs) infrastructure, within new **non-residential** development proposals **at the standards set out in paragraph 7.2 below. For new residential development proposals, the Council will encourage developers to provide EVCP wherever appropriate at a ratio of 10% of all parking spaces provided and will work with them to ensure that any issues that arise can be addressed.**
- 7.1.5. **Where EVCP infrastructure is provided,** ~~d~~Developers will need to consider both active and passive ULEV charging points as they develop their design proposals. Such considerations would include:
- The location of charging points in relation to the development e.g. proposed residential properties, public parking areas;
 - The additional requirements of charging bays e.g. additional signage, safety/protection barriers, enhanced parking bays;
 - Provision of servicing/ducting within the development to power the EVCPs infrastructure;
 - Dedicated EVCPs spaces with the necessary charging facilities.
 - The provision of ducting and other infrastructure to allow ULEVs to be readily accommodated within parking areas in the future.
 - Both the charge point hardware installation and necessary grid network reinforcement.
- 7.1.6. Where on-site provision is considered appropriate but site constraints render the installation unviable, ~~developer contributions will be required~~ **in order** to facilitate

the provision of EVCPs ~~at appropriate sites~~ **with** in the **local** area, the use of local authority sites e.g. public car parks, leisure centres or at on street parking locations, will be considered. Based on current average cost for the installation of a typical charging unit, the contribution will be £2,500 per unit required.

7.1.7. An increasing variety of funding sources are being made available to both private and public sector bodies to encourage the provision of EVCPs and infrastructure. Where possible and appropriate, the Council will utilise off-site financial contributions to secure additional grant and/or consider partnership working with external agencies in order to maximise the level of new infrastructure that can be provided. Where appropriate, management agreements can be agreed between the Council and third party landowners, the Council will also consider the siting of EVCPs within private sites characterised by high levels of public access e.g. supermarket car parks, commercial/retail developments.

7.1.8. When installing on-street charging points, wherever possible, double-headed charge points which are capable of charging two vehicles at once should be installed in order to maximise value for money and increase availability.

7.1.9. All charging points provided whether active or passive or on or off street should comply with the guidelines and technical specifications set out by the Government Office for Low Emissions Vehicles (OLEV)¹.

7.1.10. For the purpose of this SPG:

- **Active spaces** are fully wired and connected, ready to use charging points at dedicated EVCP spaces, either on or off street.
- **Passive provision** requires the necessary underlying infrastructure including the necessary cabling and ducting to enable the simple installation and activation of EVCP parking spaces at a future date. either on or off street.

7.1.11. The table below details the relevant typical technical standards for the different charge capabilities.

Table 1: Typical Charge Points Technical Standards

Charge Point Type	Power Transfer	Typical Charging Times	Typical Application
Slow	<3kW - Single Phase	8-12 Hours	Resident parking on and off street.
Fast	<7kW - Single Phase	3-4 Hours	Employees parking, retail/leisure parking, tourist attractions, residential and employment visitor parking.
	<22kW - Three Phase	1-2 Hours	
Rapid	<43kW - Three Phase	80% in 20-30 minutes	EV charging hubs, public parking, taxi ranks & bus depots.
	<50kW - DC		
Super - rapid	>43kW - Three Phase	<20-30 minutes	

¹ More details are available at www.gov.uk/government/organisations/office-for-low-emission-vehicles

	>50kW - DC		
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~~7.2 Standards of Provision for Residential Developments~~

~~7.2.1. Private / Off Street parking – For residential developments of 50 units or more:~~

- ~~• All parking spaces will be required to include passive EVCPs~~
- ~~• At least 10% of car parking spaces will be required to have active EVCPs. These must be conveniently located to the off street parking space (usually set in the property wall) that meets all relevant and current OLEV technical specifications (including a dedicated internal circuit and fuse box serving the charging point).~~

~~7.2.2. On Street Communal / Visitor Parking – for residential developments of 50 units or more, where communal / visitor parking spaces are to be provided they should be provided as passive spaces at the outset with at least 10% of all communal / visitor parking spaces being active spaces for EVCPs. All EVCPs should be located in prominent and convenient locations within communal car parking courts and be laid out and include signage, lighting and access spaces.~~

7.2. Standards of Provision for Non-Residential Developments

- 7.2.1. Other developments meeting the thresholds set out in Table 2 (below) will be required to provide active EVCPs to the OLEV technical specifications of at least 10% of car parking spaces, which shall be a 'Fast' charge point type.
- 7.2.2. It should be noted that EVCPs will form a part of the normal parking requirement i.e. if the parking requirement for a development is 20 spaces two of the 20 spaces will need to accommodate EVCP infrastructure.

Table 2: Thresholds for Electric- Vehicle Charging Parking Spaces

Use	Threshold
Retail	> 1,000sq.m gross floor area
Leisure facilities including hotels	> 1,000sq.m gross floor area
Business	> 2,500sq.m gross floor area
Industry	> 5,000sq.m gross floor area
Distribution and warehousing	> 10,000sq.m gross floor area
Hospitals	> 2,500sq.m gross floor area
Stadia	> 1,500 seats
Housing	> 50 dwellings

8. Car parking for people with disabilities

- 8.1. The needs of mobility impaired people must be taken into account in the planning and design of new development including the number of available parking spaces, their design, quality and location on site. Appendices 1 and 2 of the parking standards provide details in respect of the specific standards that will be applied in relation to disabled parking spaces.

9. Further Advice and Contacts

- 9.1. Further advice on all aspects of this guidance can be sought from the Council's Planning, Road Safety and Highways departments (see below).

Planning Duty Officer

Development Management

Dock Office

Barry Docks

Barry

CF63 4RT

Email: planning@valeofglamorgan.gov.uk

Tel: (01446) 704681

Principal Engineer – Highway Development

Highway and Engineering Services

The Alps Depot

Quarry Road

Wenvoe

CF5 6AA

Email: highwaydevelopment@valeofglamorgan.gov.uk

Tel: 02920 673081

Designing out Crime Officer

South Wales Police

Territorial Policing Hub

South Wales Police Headquarters

Tel: 01656 655555 Ext: 29251

Jon.Brown@south-wales.pnn.police.uk

10. Parking Standards by Land Use

10.1. Residential: New Build and Conversions

ZONES A - E

Type of Development	Residents	Visitors
General Purposes Houses and Apartments		
Houses	1 space per bedroom (maximum requirement 3 spaces)	1 space per 5 units
Apartments	1 space per bedroom (maximum requirement 3 spaces)	1 space per 5 units
Conversions to bedsits, or self-contained apartments	1 space per bedroom (maximum requirements 3 spaces)	1 space per 5 units
House conversions to residential hostel	1 space per resident staff 1 space per 3 non-resident staff	Nil
Special Purpose Housing		
Self-contained elderly persons dwelling (not wardened)	1 space per 2 – 4 units	1 space per 4 units
Self-contained elderly persons dwelling (wardened)	1 space per 4 units 1 space for warden 1 space per 2 ancillary staff	1 space per 4 units
Purpose built student accommodation under College / University control	1 space per 25 beds for servicing, wardens and drop-off areas	1 space per 10 beds (for students &/or visitors)
Residential children's homes / homes for elderly persons / nursing homes	1 space per resident staff 1 space per 3 non-resident staff	1 space per 4 beds

Notes relating to Residential parking standards:

1. Curtilage parking must be provided wherever possible. Where communal parking is provided, it must be conveniently sited and should be in a location that is also overlooked which will thereby enhance its security. **Where parking courts are provided they should follow the guidance contained in Manual for Streets (paragraph 4.6.3 refers)** ~~No parking court may accommodate more than 12 parking spaces~~ and depending on local context, designated parking secured by a lockable bollard or other means may be required. Safe pedestrian access must be provided between each dwelling unit and its parking space.
2. Garages should be provided as the most secure parking option wherever possible, preferably located alongside the dwelling. Remote garage blocks must be avoided.
3. Garages may only be counted as parking spaces if they have the following internal dimensions, as suggested by Manual for Streets: 6m x 3m for a single garage, and 6m x 6m for a double garage. If disabled access is required, these dimensions must be increased to 6m x 3.8m for a single garage and 6m x 6.3m for a double garage. A standard parking space dimension is 2.6m x 4.8m, however sufficient space must surround this to enable safe and convenient access to vehicles. Therefore a driveway serving a residential property will usually require a width of no less than 3.6m. For double driveways, the width is increased to 6.0m. All parking spaces adjacent to the carriageway or fronting a garage are required to be provided at a length of 6.0m to allow loading and unloading of vehicles or to enable access to the garage.
4. Visitor parking must be designed as an integral part of any development where it is required and must take into account the needs of the disabled.
5. In respect of residential homes for the elderly and nursing homes, sufficient operational space must be provided close to the building to enable ambulance access and egress in a forward gear.

10.2. Offices: Use Class B1 Business, Class A2 Financial & Professional Services (including Call Centres)

ZONES A & B

Development	Requirement	Development	Requirement
Offices (<1,000 sqm)	1 space per 35 sqm	Offices (>1,000 sqm)	1 space per 60 sqm
Call Centres (<1,000 sqm)	1 space per 25 sqm	Call Centres (>1,000 sqm)	1 space per 40 sqm

ZONES C-E

Development	Requirement	Development	Requirement
Offices (<1,000 sqm)	1 space per 25 sqm	Offices (>1,000 sqm)	1 space per 40 sqm
Call Centres (<1,000 sqm)	1 space per 20 sqm	Call Centres (>1,000 sqm)	1 space per 25 sqm

Notes relating to Offices parking standards:

- Office redevelopments, extensions and conversions will have the same requirements as for new build, subject only to note 2 below.
- For premises up to a maximum of 200 sqm gross floor area an increase of 20% will be permitted without the need for additional parking. This allowance can only be made once and any parking displaced must be relocated.
- Consideration may be given to a relaxation of the parking requirements in shopping areas for the change of use at ground floor level of premises from Use Class A1 (shops) to Use Class A2 (Financial & Professional Services).
- Parking reserved for use by disabled persons: Refer to Appendix 1.
- For cycle and motorcycle parking refer to Appendices 4 & 5.

10.3. Shops: (Including Shops, Supermarkets & Superstores)

ZONES A & B

Type of Development	Operational	Non-operational
Shops (<200 sqm)	1 commercial vehicle space	1 space per 60 sqm
Shops and small supermarkets (201 sqm – 1,000 sqm)	2 commercial vehicle spaces	1 space per 40 sqm
Shops and small supermarkets (1,001 sqm – 2,000 sqm)	3 commercial vehicle spaces	1 space per 40 sqm
Supermarkets and superstores (predominantly food)(>2,000 sqm)	3 commercial vehicle spaces	1 space per 14 sqm 1 Taxi bay per 100 sqm GFA

ZONES C & D

Type of Development	Operational	Non-operational
Shops (<200 sqm)	1 commercial vehicle space	1 space per 60 sqm
Shops and small supermarkets (201 sqm – 1,000 sqm)	2 commercial vehicle spaces	1 space per 20 sqm
Shops and small supermarkets (1,001 sqm – 2,000 sqm)	3 commercial vehicle spaces	1 space per 20 sqm
Supermarkets and superstores (predominantly food)(>2,000 sqm)	3 commercial vehicle spaces	1 space per 14 sqm 1 Taxi bay per 100 sqm GFA

ZONE E

Type of Development	Operational	Non-operational
Shops (All sizes)	1 commercial vehicle space	1 space per 60 sqm

Notes relating to Shops parking standards:

1. The non-operational standard assumes a retail to non-retail ratio of 75:25. Variation may be applied at the discretion of the Local Authority when a different ratio is used.
2. Although 'retail parks' may have shared parking, such developments will still require similar levels of parking to single stores, because of the longer duration of parking.
3. Where existing premises are used for the establishment of a stall type market, the applicant shall identify a location for the provision of visitor parking.
4. For premises up to a maximum of 200 sqm gross floor space, an increase of 20% will be permitted without the need for additional parking. This allowance can only be made once, and any parking displaced must be relocated.
5. Increases in transactions at supermarkets are not proportional to increases in floor area. Extensions of 33% of gross floor area produce a 10% increase in transactions.
6. The non-operational standard includes employees parking.
7. Parking Reserved for Disabled People: Refer to Appendix 1.
8. For cycle and motorcycle parking refer to Appendices 4 & 5.
9. In addition to the operational parking requirements for servicing purposes, sufficient additional space must always be provided to allow servicing vehicles to both enter and leave the curtilage of the store servicing area in a forward gear.

10.4. Retail Warehousing and Garages

ALL ZONES

Type of Development	Operational	Non-operational
Retail Warehousing (non-food)(non-DIY)(>1,000 sqm)	3 commercial vehicle spaces	1 space per 30 sqm
Retail Warehousing (DIY & Garden Centres) (>1,000 sqm)	3 commercial vehicle spaces	1 space per 20 sqm
Builders Merchants (Trade & Retail)	3 commercial vehicle spaces	1 space per 80 sqm & 10% of GFA
Cash & Carry Warehousing (Trade Only)(>1,000 sqm)	3 commercial vehicle spaces	1 space per 50 sqm
Open Air Markets & Car Boot Sales	1 space per stall pitch	1 space per 30 sqm of gross stall pitch area including pedestrian circulation area
Vehicle Repair Garages	1 car/lorry space per each car/lorry service bay	2 car/lorry spaces per each service bay
Service Stations (Exhausts, MoT, Tyres etc.)	1 lorry space & 20% of GFA	2 car/lorry spaces per each service bay
Petrol Filling Stations (see note 10 re. associated convenience stores)	1 space for petrol tanker	4 spaces for ancillary use (e.g. automatic car wash)
Car Sales Premises	1 space for car transporter	1 space per 50 sqm of retail area (internal & external)
Motorcycle Sales Premises	1 commercial vehicle space	1 space per 50 sqm of retail area (internal & external)
Driving Schools Private Hire / Vehicle Hire Licensed Taxis	1.25 spaces per vehicle operated	1 space per 3 auxiliary staff

Notes relating to Retail Warehouses and Garages parking standards:

1. The range of trip generation and parking demand at retail warehouses varies to a considerable extent. The parking requirements of the most common types of store can be classified in broad bands. This is reflected by the tabulated requirements.
 - Highest requirement - DIY stores
 - Mid-range requirements - Electrical/gas appliance, flat pack furniture stores
 - Lowest requirement - Assembled furniture/carpet stores, household and leisure goods stores
2. Although 'retail parks' may have shared parking, such developments will still require similar levels of parking to single stores, because of the longer duration of parking.
3. Where existing premises are used for the establishment of a stall type market, the applicant shall identify a location for the provision of visitor parking.
4. For premises up to a maximum of 200 sqm gross floor space, an increase of 20% will be permitted without the need for additional parking. This allowance can only be made once, and any parking displaced must be relocated.
5. Increases in transactions at supermarkets are not proportional to increases in floor area.
6. Extensions of 33% of sales floor area produce a 10% increase in transactions.
7. The non-operational standard includes employees parking.
8. Relaxation may be given to the parking requirements at fast service centres, e.g. tyres, exhausts, MOTs etc.
9. Where car sales premises include external display areas, additional parking space will be required.
10. Parking Reserved for Disabled People: Refer to Appendix 1.
11. For cycle and motorcycle parking refer to Appendices 4 & 5.
12. In addition to the operational parking requirements for servicing purposes, sufficient additional space must always be provided to allow servicing vehicles to both enter and leave the curtilage of the premises' servicing area in a forward gear.
13. Convenience stores located at petrol filling stations will attract customers who do not also purchase petrol and will therefore require parking space. The additional requirement for this must be assessed as for a small shop.

10.5. Industry and Industrial Warehousing

Zones A-C

Type of Development	Operational	Non-operational
Small Industry (<100 sqm)	1 van space	1 space
Small Industry (<235 sqm)	1 van space	2 spaces
Industry	See Note 5	1 space per 120 sqm
Highly Technical Industry	See Note 5	1 space per 35 sqm
Industrial Warehouses	See Note 5	1 space per 140 sqm
Storage Warehouses	1 commercial space per 500 sqm	Nil
Distribution Centres (<1,000 sqm)	35% of GFA	1 space per 120 sqm
Distribution Centres (>1,000 sqm)	25% of GFA	1 space per 120 sqm

Zones D-E

Type of Development	Operational	Non-operational
Small Industry (<100 sqm)	1 van space	1 space
Small Industry (<235 sqm)	1 van space	2 spaces
Industry	See Note 5	1 space per 80 sqm
Highly Technical Industry	See Note 5	1 space per 20 sqm
Industrial Warehouses	See Note 5	1 space per 140 sqm
Storage Warehouses	1 commercial space per 500 sqm	Nil
Distribution Centres (<1,000 sqm)	35% of GFA	1 space per 80 sqm
Distribution Centres (≥1000 sqm)	25% of GFA	1 space per 80 sqm

Notes relating to Industry and Industrial Warehousing parking standards:

1. Vehicles should be able to enter and leave the site in forward gear.
2. Relaxation permitted for operational space when special servicing arrangements are made.
3. Visitor parking is included in non-operational parking.
4. For premises up to a maximum of 235 sqm gross floor space, an increase of 20% will be permitted without the need for additional parking. This allowance can only be made once and any parking displaced must be relocated.
5. Operational requirements:

GFA sqm	Minimum sqm	GFA sqm	Minimum sqm	GFA sqm	Minimum sqm
100	70	500	100	1,001	150
250	85	1,000	150	2,000	200

Above 2,000 sqm GFA, the required minimum operational area should be taken as 10% of GFA.

6. The General Permitted Development Order limit of 235 sqm is defined as the upper cut off for size for units to encourage new firms requiring garage size sites. Larger units are defined as, "Industry".
7. Industries of a highly technical nature are companies specialising in technical innovation usually microprocessor based.
8. If the premises are to be used as a distribution depot, adequate space must also be provided to accommodate commercial vehicles that are likely to be parked overnight.
9. Parking reserved for Disabled People: See Appendix 1.
10. For cycle and motorcycle parking refer to Appendices 4 & 5.

10.6. Places of Entertainment

ZONES A-C

Type of Development	Operational	Non-operational
Children's Play Centres	1 space per 3 members of staff	1 space per 20 sqm of play area
Assembly Halls (Commercial) e.g. Bingo	1 commercial vehicle space	1 space per 8 sqm
Assembly Halls (Social) e.g. Unlicensed Club, Community Centre	1 commercial vehicle space	1 space per 10 sqm
Cinemas, Theatres & Conference Centres	1 commercial vehicle space	1 space per 5 seats
Stadia	1 commercial vehicle space	1 space per 15 seats

ZONES D&E

Type of Development	Operational	Non-operational
Children's Play Centres	1 space per 2 members of staff	1 space per 15 sqm of play area
Assembly Halls (Commercial) e.g. Bingo	1 commercial vehicle space	1 space per 8 sqm
Assembly Halls (Social) e.g. Unlicensed Club, Community Centre	1 commercial vehicle space	1 space per 10 sqm
Cinemas, Theatres & Conference Centres	1 commercial vehicle space	1 space per 3 seats
Stadia	1 commercial vehicle space	1 space per 15 seats

Notes relating to Places of Entertainment parking standards:

1. In addition to the operational parking requirements for servicing purposes, sufficient additional space must always be provided to allow servicing vehicles to both enter and leave the curtilage of the premises' servicing area in a forward gear.
2. Appropriate provision must be provided for use by disabled people.
3. For cycle and motorcycle parking refer to Appendices 4 & 5.

10.7. Hotels and Restaurants

ZONES A-C

Type of Development	Operational	Non-operational
Hotels	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per bedroom
Public Houses & Licensed Clubs	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per 5 sqm of public area including servery
Restaurants	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per 7 sqm of dining area
Cafes & Drive through Restaurants (see Note 5)	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per 14 sqm of dining area
Hot Food Takeaways	1 commercial vehicle space	1 space for non-resident staff & adequate on street parking for customers nearby
Transport Cafes	1 commercial vehicle space	1 space per 3 non-resident staff & 1 commercial vehicle space per 2 seats

ZONES D&E

Type of Development	Operational	Non-operational
Hotels	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per bedroom
Public Houses & Licensed Clubs	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per 3 sqm of public area including servery
Restaurants	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per 7 sqm of dining area
Cafes & Drive through Restaurants (see Note 5)	1 commercial vehicle space	1 space per 3 non-resident staff & 1 space per 14 sqm of dining area
Hot Food Takeaways	1 commercial vehicle space	1 space for non-resident staff & Adequate on street parking for customers nearby
Transport Cafes	1 commercial vehicle space	1 space per 3 non-resident staff & 1 commercial vehicle space per 2 seats

Notes relating to Hotels and Restaurants:

1. Facilities for non-residents should be assessed by applying the appropriate category. An allowance should be applied where facilities are to be shared.
2. The range in the parking requirements between zones allows for the distinction between 'country' public houses and 'suburban' public houses which are likely to have a higher proportion of walk-in trade.
3. The parking requirement will be relaxed for public houses built before 1914 to permit redevelopment or extension up to a 20% increase in gross floor area without extra parking being required.
4. The non-operational requirement for restaurants and cafes in established shopping areas may be relaxed if it can be shown that they are 'incidental' to the shopping area or where such restaurants are used largely in the evening when adequate parking exists in the vicinity. However, adequate parking for staff must be provided at the rear. (This does not apply to transport cafes).
5. Restaurants including drive through facilities for ordering and collecting food by car must have an internal segregated access for this purpose and be provided with a minimum of 6 waiting spaces.
6. In addition to the operational parking requirements for servicing purposes, sufficient additional space must always be provided to allow servicing vehicles to both enter and leave the curtilage of the premises' servicing area in a forward gear.
7. Appropriate provision must be provided for use by disabled people.
8. For cycle and motorcycle parking refer to Appendices 4 & 5.
9. All hotels must provide short stay parking for taxi drop off / pick up (minimum of 2 bays per 100 bedrooms).
10. All hotels must provide coach parking (minimum of 1 bay per 100 bedrooms).

10.8. Community Establishments

ALL ZONES

Type of Development	Operational	Non-operational
Hospitals (See Note 1)	Essential vehicles as required	2.5 spaces per bed
Health Centres & Surgeries	1 space per practitioner (See Note 2)	1 space per 3 ancillary staff (1 space per 2 in Zones 4 & 5) & 3 spaces per practitioner
Churches & Places of Worship	1 commercial vehicle space	1 space per 10 seats or 1 space per 8 sqm of praying floor space (See Note 3)
Chapels of Rest	3 commercial vehicle spaces	As per Churches etc.
Funeral Homes	3 commercial vehicle spaces	1 space per 2 members of staff
Public Leisure Centres	1 commercial vehicle space	1 space per 2 facility users & 1 space per 3 spectators
Fitness Clubs, Leisure Clubs & Sports Clubs (See Note 6)	1 commercial vehicle space	1 space per 2 facility users
Marinas	1 car and trailer space	1 space per berth
Libraries	1 commercial vehicle space	1 space per 45 sqm

Notes relating to Community Establishments parking standards:

1. This level of provision would be appropriate for acute and neighbourhood District Hospitals. For other types of hospitals a lower level of provision may be acceptable.
2. Practitioner to include doctor, dentist, nurse, health visitor etc.
3. This range is intended to reflect different catchment areas of churches and places of worship. One serving a local area would require a lower provision than one serving a wide area.
4. Consideration must be given to the provision of a coach parking area where appropriate and to cycle and motorcycle parking. Coach parking is required to be provided for leisure centres.
5. In addition to the operational parking requirements for servicing purposes, sufficient additional space must always be provided to allow servicing vehicles to both enter and leave the curtilage of the premises' servicing area, where provided, in a forward gear.
6. Clubhouse bar and restaurant facilities must always be separately assessed.
7. Parking Reserved for Disabled People: See Appendix 1.
8. For cycle and motorcycle parking refer to Appendices 4 & 5.

10.9. Educational Establishments

ZONES A-C

Type of Development	Operational	Non-operational
Day Nurseries & Crèches (new build property)	1 commercial vehicle space	1 space per 2 full time staff
Day Nurseries & Crèches (converted build property)	Included in non-operational requirement	1 space per 2 full time staff (See Note 3)
Nursery / Infants / Primary Schools	1 commercial vehicle space	1 space per each member of teaching staff & 3 visitor spaces
Secondary Schools	1 commercial vehicle space	1 space per each member of teaching staff, 1 space per 2 ancillary staff, 1 space per 20 students of age 17 and 3 visitor spaces. Bus parking as required
Colleges of Higher / Further Education (See Note 6)	1 commercial vehicle space	1 space per each member of teaching staff, 1 space per 2 ancillary staff, 1 space per 8 students and 5 visitor spaces. Coach parking as required

ZONES D&E

Type of Development	Operational	Non-operational
Day Nurseries & Crèches (new build property)	1 commercial vehicle space	1 space per 2 full time staff
Day Nurseries & Crèches (converted build property)	Included in non-operational requirement	1 space per 2 full time staff
Nursery / Infants / Primary Schools	1 commercial vehicle space	1 space per each member of teaching staff, 1 space per 2 ancillary staff & 3 visitor spaces
Secondary Schools	1 commercial vehicle space	1 space per each member of teaching staff, 1 space per 2 ancillary staff, 1 space per 10 students of age 17 and 3 visitor spaces. Bus parking as required
Colleges of Higher / Further Education (See Note 6)	1 commercial vehicle space	1 space per each member of teaching staff, 1 space per 2 ancillary staff, 1 space per 5 students and 5 visitor spaces. Coach parking as required

Notes relating to Educational Establishments:

1. In addition to the non-operational parking an area must be provided for the picking up and setting down of school children.
2. In the case of Day Nurseries in converted properties the availability of adequate kerbside capacity (i.e. unrestricted parking) should be taken account of.
3. This should be assessed when the nursery is at full capacity. Where part-time staffs are employed they should be aggregated to their full time equivalents.
4. Experience has shown that a minimum of 15 car spaces will be required for most other types of schools. Exceptions to this may be specialised (e.g. Religious or Welsh) secondary schools with a large catchment area where a reduced number may be adequate, or larger schools in each category where a substantial increase (up to 50) may be desirable. With regard to buses, sufficient off street spaces should be provided for all services that the operator of the new school anticipates running for pupils, with the exception of passing service buses.
5. The parking area should include a facility for vehicles to turn without reversing. In exceptional circumstances a circulation/turning area remote from pupil circulation areas would be acceptable.
6. Where there is a high level of part-time (day release) students, the standard for Colleges of Higher Education/Universities is increased to 1 per 3 students.
7. Where the school is used for dual social and adult educational purposes, the use of hard playground surfaces for parking is acceptable.
8. Definitions of schools for the purposes of these standards:-
 - Nursery - pre-school age groups 3 - 5 often in converted residential property.
 - Infants - formal schools ages 3 to 7
 - Primary - schools for children in the range 5 or 7 to 11
 - Secondary - age range 11 to 18
 - Colleges of Higher and Further Education - includes sixth form colleges.
9. Appropriate provision must be provided for use by disabled people.
10. Appropriate provision must be provided for parental drop off/pick up of children as dictated by local circumstances and any school travel plan. Drop off areas must be located so that the safety of pupils walking or cycling to school is not jeopardised.
11. For cycle and motor cycle parking refer to Appendices 4 & 5

11. Appendices

11.1. Appendix 1: Access for The Disabled Guidance Notes For Applicants

All new public buildings are now required, where reasonable and practicable, to be accessible to and have facilities for disabled people. The requirements of the Chronically Sick and Disabled Persons Act 1970 and the Chronically Sick, Disabled Persons (Amendment) Act 1976 and Disability Discrimination Act 2005 apply to a wide range of buildings, including: offices, shops, banks, post offices, sports centres, hotels, restaurants and public houses, theatres and cinemas, exhibition centres, libraries and museums, community and church halls; together with all places of education, including schools, universities and colleges. This list is not exhaustive and other types of building can fall within the terms of the Act.

Parking spaces for disabled persons must also be designed in accordance with Building Regulations Part M and the Approved Documents to the Building Regulations should provide design guidance on design methods that would comply with the Regulations.

In publishing a comprehensive document on parking standards, it was recognised that the fundamental requirement of access to buildings by the disabled was very much bound up with the parking arrangements and therefore this Appendix has been prepared to draw the attention of developers to these complementary matters.

Having examined many guidelines provided by a number of bodies and authorities, which all cover the same ground to a greater or lesser extent, it has been recommended that the following publications be used as the basis for guidance:

“Reducing Mobility Handicaps”

Guidelines published by The Institution of Highways and Transportation, 6 Endsleigh Street, London, WC1H 0DZ.

“Planning and Access for Disabled People”

A good practice guide published by the Department for Communities and Local Government, PO Box 236, Wetherby, LS23 7NB

The former document is particularly detailed on the external considerations of a development whilst the latter concentrates more strongly upon the Planning System; however, they should be read and applied in a complementary manner.

In addition to the contents of these two documents, developers must give due consideration to the following aspects, which are considered important to disabled persons.

- A. The signing of pedestrian routes - having established the most convenient location for parking the vehicles of disabled persons, it is essential that a clear system of sign posting to the appropriate access catering for disabled persons should be devised and, implemented by the developer.

- B. The gradient of any ramp should be as slight as possible. The use of the term 'maximum gradient 1 in 12' should not be construed as being acceptable to disabled persons, except where it is absolutely unavoidable. Developers should consider very carefully the relative levels of parking spaces and finished floor levels at an early stage in their planning, so that a level or near level pathway (preferably less than 5% gradient) can be maintained between the two, if at all possible.
- C. The difficulty caused to disabled persons in gaining entrance into a building is covered by the documents but the delay in opening doors etc., can cause considerable discomfort and therefore the developer should consider providing a canopy over entrances designed for the use of disabled persons.

Parking Reserved for Disabled People

It is recommended that appropriately positioned parking places, preferably within 50 metres of the facility served by the car park and which are adequate in size and number, shall be provided for people with disabilities. The size of each parking place and level of provision should be in accord with the recommendations in the Department for Transport's document 'Inclusive Mobility', 'A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure' (2002). However this guidance document is currently under review and is likely to be updated with improved content and scope in the near future. Should the recommended disabled parking standards be amended as a result of this review, the SPG will be amended accordingly.

The recommended proportions of spaces for Blue Badge holders are:-

- For car parks associated with existing employment premises;
 - 2% of the total car park capacity, with a minimum of one space (spaces for disabled employees must be additional to those recommended above, reservation could be ensured, for example, by marking a space with a specific registration number).

- For car parks associated with new employment premises;
 - 5% of the total car park capacity should be designated (to include both employees and visitors).

- For car parks associated with shopping areas, leisure or recreational facilities and places open to the general public;
 - A minimum of one space for each employee who is a disabled motorist plus 6% of the total car park capacity for visiting disabled motorists.
 - The numbers of designated spaces may need to be greater at hotels and sports stadia that specialize in accommodating groups of disabled people.

- For car parks associated with railway stations;
 - A minimum of one space for each railway employee who is a disabled motorist plus:
 - For a car park with fewer than 20 spaces, a minimum of one disabled space
 - For a car park of 20 to 60 spaces, a minimum of two disabled spaces
 - For a car park of 61 to 200 spaces, 6% of capacity with a minimum of three disabled spaces
 - For a car park with more than 200 spaces, 4% of capacity plus four disabled spaces.

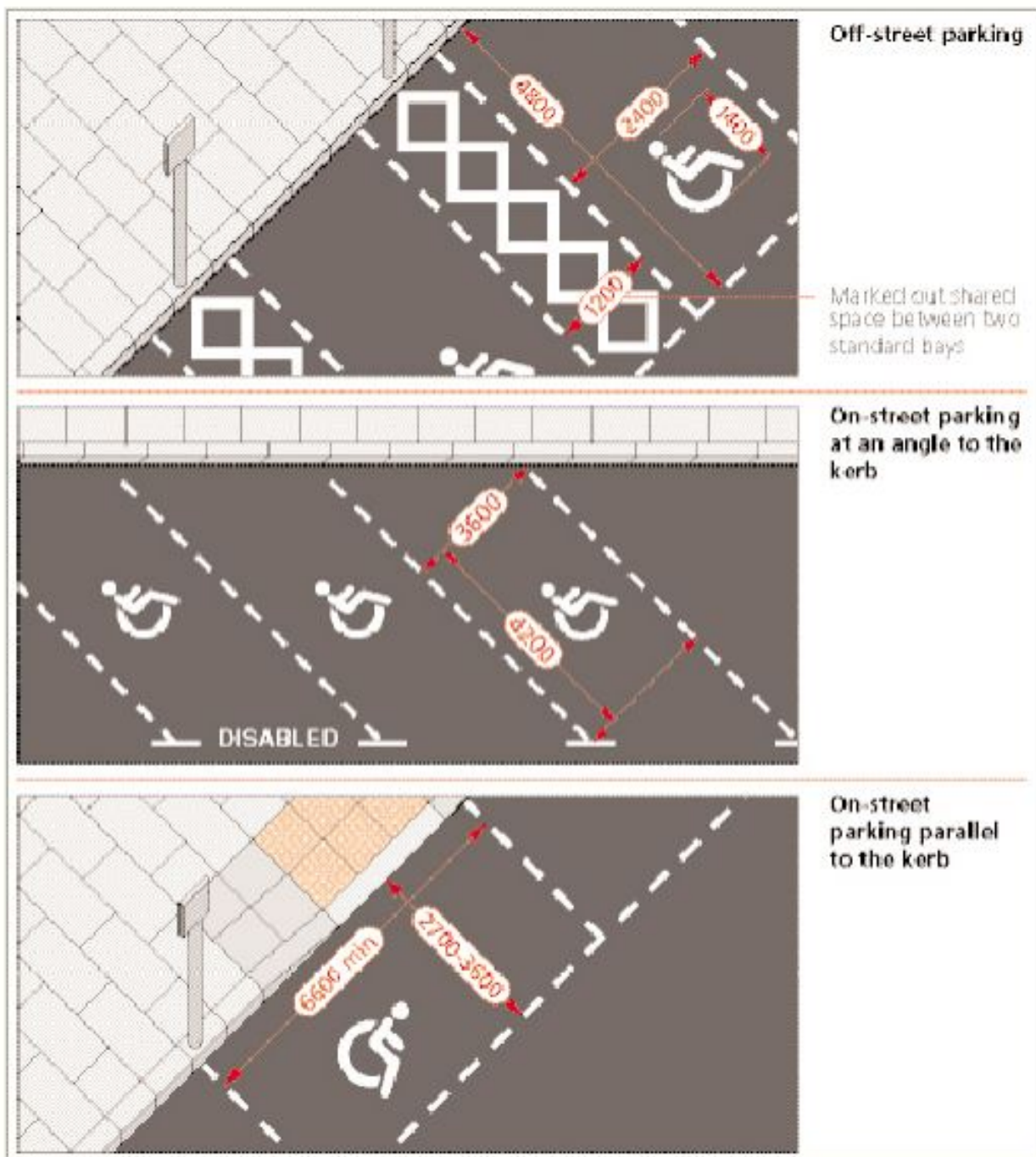
Disable Parking Bay Design

On-street parking parallel to the kerb: within the marked parking space, a clear rectangular space should be provided which is a minimum of 6.6m long by 2.700m wide (preferably 3,6m). The extra width allows for an access zone on kerb or street side. On-street parking at an angle to the kerb: the parking space should be a minimum of 4.2m long by 3.6m wide. It is recommended that kerbside parking bays should be sited where road gradient and camber are reasonably level e.g. 1:50. A road with a steep camber causes difficulties for wheelchair users who have a side lift in their vehicle. Where designated bays on-street are at a different level from the adjacent pavement, dropped kerbs should be provided for wheelchair users, with appropriate tactile marking. It should be remembered that parking vehicles partly on the pavement is one of the main causes of concern to blind and visually impaired people in the pedestrian environment. Off-street parking: bays should be a minimum of 4.8m long by 2.4 m wide with additional space:

1. Where bays are parallel to the access aisle and access is available from the side an extra length of at least 1.8 m, or,
2. Where bays are perpendicular to the access aisle, an additional width of at least 1.2 m along each side. Where bays are adjacent the same 1.2 m space can serve both sides. There should also be a 1,200 mm wide safety zone at the vehicle access end of each bay to provide boot access or for use of a rear hoist.

Bay marking and signing

On-street bays should be indicated by signs in accordance with TSRGD; road markings must also confirm to TSRGD. Each bay should have a raised sign at the head of the bay to ensure that if snow or fallen leaves obscure the road markings, the purpose of the bay is still apparent.



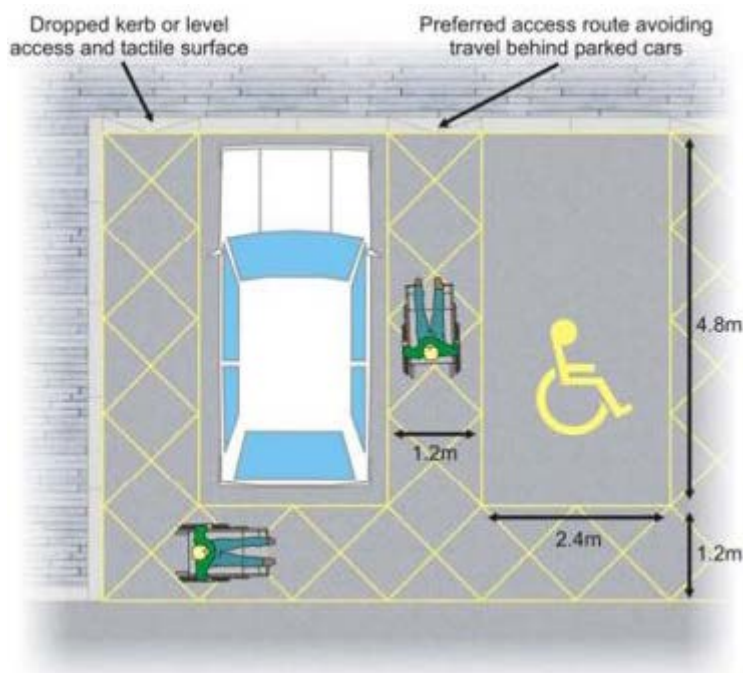
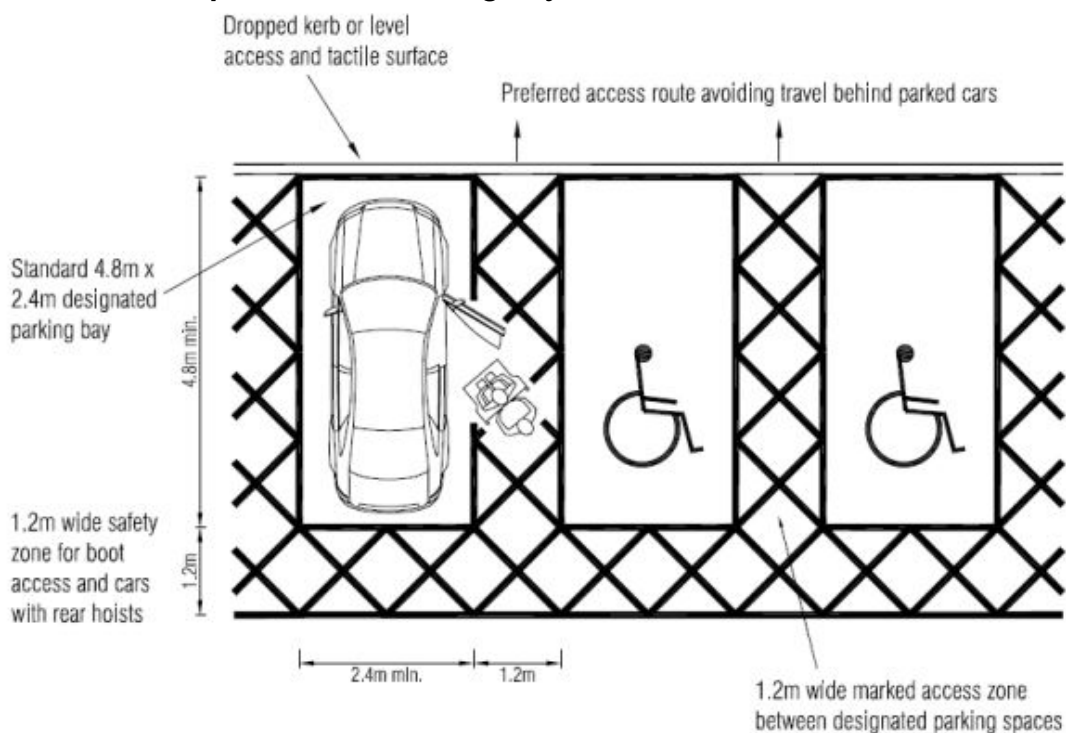
(Source: Inclusive Mobility Department for Transport 2005)

Disabled persons parking bays in off-street locations should be marked out with yellow lines and a yellow wheelchair symbol within the parking space. A sign, or if appropriate signs should be provided at the entrance to the car park to direct disabled motorists to designated parking spaces which, if the car park is not under cover, should also have raised signs at the head of the reserved bays. Signs inside the car park should show the most convenient way to the facilities served by the car park, with an approximate distance to those facilities. The marking out should comply with British Standard BS8300:2001 'Design of buildings and their approaches to meet the needs of disabled people – Code of Practice' as

well as to the recommendations of the Department for Transport's document 'Inclusive Mobility' (see note above), 'A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure' (2002).

On street disabled parking bays should be indicated by signs and marked out in full compliance with the Traffic Signs Regulations and General Directions (1994). Each bay should have a raised sign at the head of the bay to ensure that if snow or fallen leaves obscure the road markings, the purpose of the bay are still apparent.

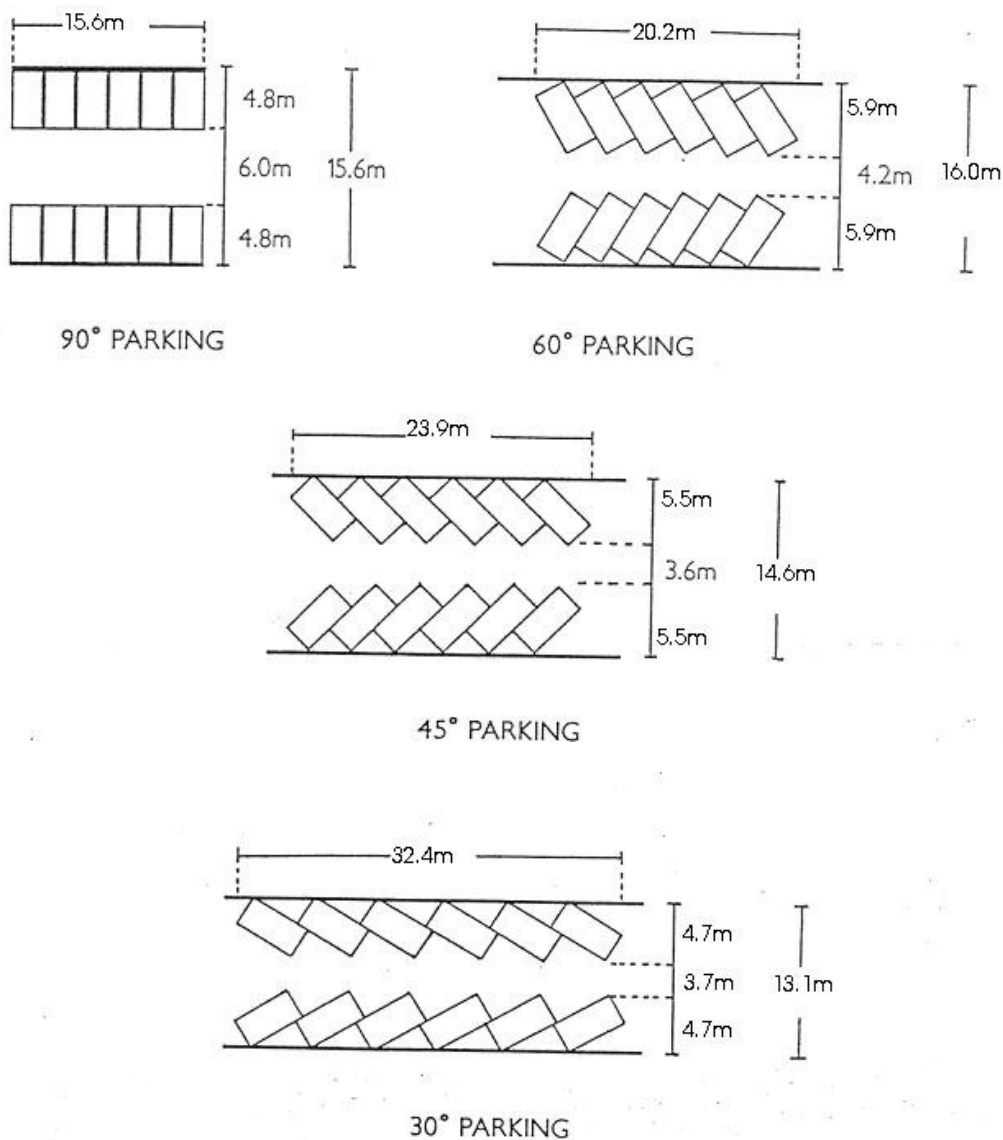
Off Street Multiple Disabled Parking Bays



11.2. Appendix 2 – Layout of Parking Areas

A standard parking space dimension is 2.6m x 4.8m, however sufficient space must surround this to enable safe and convenient access to vehicles. Therefore a driveway serving a residential property will usually require a width of no less than 3.6m. For double driveways, the width is increased to 6.0m. All parking spaces adjacent to the carriageway or fronting a garage are required to be provided at a length of 6.0m to allow loading and unloading of vehicles or to enable access to the garage. In addition, different parking layouts such as parallel, in line or angled parking schemes will have slightly different overall space requirements and some examples and space dimensions are illustrated below.

Alternative Ways of Arranging 12 Spaces



Vehicle Bays - The bay must be of sufficient size and be located so that the vehicle can be manoeuvred within the site, e.g. the 12 m rigid lorry requires a absolute minimum of 105 sqm to allow it to leave a site in forward gear. Further details of good design practice can be found in appropriate Highway Authority Design Standards or 'Designing for Deliveries', Freight Transport Association 1998.

- Articulated Vehicles 16.5 m x 2.55 m
- Articulated Low loader Vehicles 18.0 m x 2.55 m
- Rigid Vehicles 12.0 m x 2.55 m
- Buses and Coaches (two axle) 13.5 m x 2.55 m
- Buses and Coaches (three axle) 15.0 m x 2.55 m
- Buses and Coaches (Articulated) 8.75 m x 2.55 m
- Refrigerated vehicles maximum allowed width is 2.65 m

All vehicles should enter and leave the site in forward gear.

Further guidance on parking layouts can be found in Manual for Streets.

11.3. Appendix 3 Landscaping

Planting should be used in car parks to relieve the monotony of areas of paving: to define or screen parking bays, and to provide visual features. Landscaping is seen as an integrated part of the design of parking areas and not as an afterthought. Grass, ground cover plants, shrubs and trees used in car parks should be pollution resistant varieties, and in the case of trees should not be a type liable to heavy leaf fall, fruit dropping or branch shedding. Particularly to be avoided are most varieties of lime, maiden hair and horse chestnut. Care should be taken that planting does not obscure sight lines at junctions or remove any degree of natural surveillance.

Plant selection should reflect local character and vegetation and draw on native as well as the more ornamental of exotic species. Ultimate height and spread should be considered in relation to nearby structures. Plant selection must exclude those species of plant that harbour litter.

A useful guide for species choice is available on a web site compiled by the Horticultural Trades Association in consultation with the Landscape Institute at www.plantspec.org.uk.

In some circumstances, hard landscaping may be more appropriate, e.g. concrete blocks, bricks, paving slabs, cobbles.

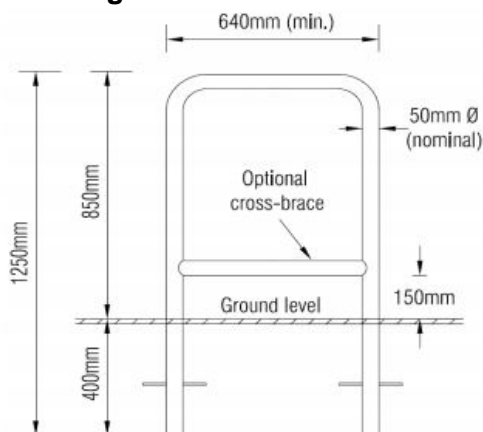
There is a wide variety of surfacing materials available, which can be used for car parks. The choice of which one to use in a specific situation will depend on the intensity of use expected, the desired appearance and the amount of money available for laying and maintenance.

The design and landscaping of car parks should take into account the guidance contained within the assessment guidelines of the Park Mark safer parking initiative of the Association of Chief Police Officers as well as the more general requirements of Planning Policy Wales Technical Advice Note 12: Design (TAN12).

11.4. Appendix 4 Cycle Parking Standards

1. Short stay parking and long stay parking are separately considered in the following tables. Short stay parking addresses the needs of customers or other visitors to a development, whereas long stay parking is applicable to the needs of staff. Staff should also be encouraged to cycle to work by the provision of additional facilities such as lockers, changing areas and showers. Covered cycle parking stands can also be an important element in encouraging the use of cycles.
2. Cycle parking should be located in a safe, secure and convenient location. Care should also be taken to ensure that cycle parking facilities are not located where they may obstruct pedestrians, disabled persons and particularly people with sight problems.
3. Appropriate signing should always be provided to indicate the location of short term cycle parking.
4. For reasons of security, cycle parking facilities should be located in areas that are visible and therefore allow for informal surveillance. In certain instances this could need to be supplemented through the introduction of CCTV or other security means.
5. Guidance on the design of cycle parking is available in the DfT Traffic Advisory Leaflet 5/02 “Key Elements of Cycle Parking” and in Sustrans Information Sheet FF37 “Cycle Parking”, however the standard Sheffield parking rack design is illustrated below.
6. All residential developments must be accessible by cycles and cycle storage must be a factor of dwelling design. In appropriate circumstances, convenient communal facilities may be provided. Guidance on this subject is available within Manual for Streets.
7. Where a development is located within a commercial centre and it is not appropriate for a particular reason to provide cycle parking facilities, the developer should be asked to provide a financial contribution towards the provision of sustainable transport.
8. The provision of facilities for cyclists should be specifically considered whenever a Travel Plan is accepted.

Typical Sheffield Cycle Rack Design



Minimum distance between rows of racks 2 m.

Type of Development	Cycle Parking Provision	
	Long Stay	Short Stay
a) Residential		
Apartments	1 stand per 5 bedrooms	No requirement
Purpose built student accommodation	1 stand per 2 bedrooms	No requirement
Self-contained elderly persons accommodation	1 stand per 20 bedrooms	1 stand per 20 bed spaces
b) Offices		
Offices	1 stand per 200 sqm	1 stand per 1,000 sqm
Call Centres	1 stand per 150 sqm	1 stand per 1,000 sqm
c) Shops		
Shops <200 sqm	1 stand per 100 sqm	1 stand per 100 sqm
Shops 201 sqm – 1,000 sqm	Food 1 stand per 500 sqm Non-Food 1 stand per 500 sqm	1 stand per 500 sqm 1 stand per 750 sqm
Supermarkets	1 stand per 500 sqm	1 stand per 500 sqm
d) Retail Warehousing		
Retail Warehousing	Non-Food 1 stand per 500 sqm	1 stand per 1,000 sqm
Cash and Carry warehousing	1 stand per 500 sqm	No requirement
Open Air markets	1 stand per 500 sqm	1 stand per 500 sqm
Garages	1 stand per 250 sqm	No requirement
Car Sales Premises	1 stand per 1,000 sqm	No requirement
e) Industry & Industrial Warehousing		
Industry	1 stand per 500 sqm	1 stand per 1,000 sqm
Industrial Warehousing & Storage Centres	1 stand per 500 sqm	No requirement
f) Places of Entertainment		
Assembly Halls:	Commercial 1 stand per 10 staff Social Included in short stay	1 stand per 40 seats 1 stand per 30 sqm
Cinemas, Theatres & Conference Centres	1 stand per 10 staff	1 stand per 30 seats
Stadia	1 stand per 10 staff	1 stand per 100 seats
g) Hotels and Restaurants		
Hotels & Public Houses	1 stand per 5 bedrooms	1 stand per 4 sqm of public floor space
Restaurants & Cafes (All types)	1 stand per 10 staff	No requirement
h) Community Establishments		
Hospitals	1 stand per 20 beds	1 stand per 20 beds
Health Centres & Surgeries	Included in short stay	1 stand per consulting room
Churches & Places of Worship	Included in short stay	1 stand per 50 sqm of public floor space
Public Leisure Centres	1 stand per 10 staff	1 stand per 50 sqm of public floor space
Fitness Clubs	1 stand per 10 staff	1 stand per 25 sqm of public floor space
Leisure Clubs & Sports Clubs	1 stand per 10 staff	1 stand per 10 facility users

Parking Standards SPG – ~~Draft for Consultation (December 2018)~~ **(March 2019)**

Libraries	1 stand per 10 staff	1 stand per 30 sqm of public floor space
i) Educational Establishments		
Day Nurseries & Crèches	Included in short stay	1 stand per 30 children
Nursery, Infants & Primary Schools	1 stand per 5 staff and 1 stand per 20 children	1 stand per 100 children
Secondary Schools & Colleges of Further Education	1 stand per 5 staff and 1 stand per 6 students of age 17	1 stand per 100 children
j) Transport Facilities		
Park & Ride Car Parks	1 secure stand per 20 car parking spaces	No requirement

11.5. Appendix 5 Motorcycle Parking Standards

1. Motorcycle parking should be located in a safe, secure and convenient location where other vehicles cannot encroach or obstruct the motorcycle parking area.
2. Motorcycles are prone to theft. For reasons of security, motorcycle parking facilities should be located in areas that are visible and therefore allow for informal surveillance. Surrounding high walls or shrubbery should be avoided as they could provide cover for thieves. In certain instances the introduction of CCTV or other security means could be necessary. In particular these facilities should be located where other larger vehicles, such as vans, could not be used to steal the motorcycles.
3. Robust anchor points must be provided to lock the motor cycles to, but the design of the anchor points must be such that they are able to accommodate a wide range of motorcycle wheel sizes, but without affording easy leverage for bolt croppers or other equipment used for the purposes of theft. Care must also be taken to ensure that locking facilities do not present a trip hazard to pedestrians, disabled persons and particularly people with sight problems.
4. Covered motorcycle parking would clearly be of benefit to riders, particularly for long term parking, as would the supply of convenient litter bins as riders have little space for carrying surplus articles. It is also important to consider the supply of lockers for storage of rider’s protective clothing and helmets.
5. Motorcycle length and width dimensions are generally reduced when parked, as the front wheel will be turned to a locked position. The effective length and width vary between about 1600mm to 2,300 mm (length) and 650 mm to 900 mm (width). A bay size of 2.8 m x 1.3 m is recommended.
6. A further consideration is that of disabled riders. It is suggested that provision be made for disabled riders by way of special marked out bays of increased size. Any rider experiencing reduced mobility and strength will benefit from extra room to position themselves to the side of their bike when manoeuvring or mounting. As the rider population ages, stiffness and reduced range of movement will make this a common issue.
7. Motorcycle parking bays should not be surfaced with bitumen based material as it can soften in hot weather, causing the stand of the motorcycle to sink and the bike to topple. Concrete surfaces should avoid this problem.
8. Further guidance is available in Manual for Streets.

Type of Development	Motorcycle Parking Provision
All classes of development	55 f provision for car parking

12. Definitions and Notes

Operational Parking Space - Sufficient space to allow the maximum number and size of vehicles likely to serve the development at any one time and to manoeuvre with ease and stand for loading and unloading without inconvenience to vehicles and pedestrians on the public highway or to other users of the site.

Space for staff cars which, by the nature of the business, is required for day to day operation, may also be included.

Non-Operational Parking Space -The space occupied by vehicles not necessarily used for the operation of the premises. This is divided into two classes:

Long term (i.e. commuter parking) mainly occupied by vehicles of staff/clients/customers whose attendance at the premises are of long single durations.

Short term parking space required by staff/clients/customers whose attendances at the premises are of short single durations.

Residential Parking Space -The space required for residents and space for cars of people visiting the residents.

Gross Floor Area -The standards that are related to floor areas are gross floor areas, i.e. including external walls, except where the text stipulates otherwise in respect of public houses, restaurants, cafes and places of worship.

Extension or Development of Existing Buildings - For industrial, office, commercial premises and pre-1914 public houses, under 235 sqm gross floor area, an increase of 20% will be permitted without the need for additional parking. This allowance can only be made once and any parking displaced must be relocated.

Public Transport Accessibility - Public transport provision has the potential to reduce use of the car and where appropriate the level of this provision should be enhanced as planning gain through the planning process. Ease of access to public transport is related to the required parking levels through the zoning system introduced by this document.

Employment Density - The standards have been assessed on density norms (retail 19.5 sqm per employee; industrial 35 – 45 sqm per employee, office 16.5 sqm per employee). Variations in density may be treated on their merits.

Land Use - for the purpose of applying the parking standards the following table outlines the land uses specified within the Town and Country Planning (Use Classes) Order 1987.

Use Classes In 1987 Order Land Uses in Parking Guidelines

Use Classes in 1987 Order	Land Uses in Parking Guidelines
Class A1: Shops	Shops Supermarkets and Superstores Retail Warehousing (Cash and Carry)
Class A2: Financial & Professional Services	Offices (only in cases where premises are provided principally for visiting members of the public).
Class A3: Food & Drink	Restaurants, Public Houses, Cafes, transport Cafes, Licensed Clubs.
Class B1: Business	Offices (other than in A2 above) / Light industry
Class B2: General Industrial	Industry
Class B3 – B7: Special Industrial	Industry
Class B8: Storage or Distribution	Wholesale Warehousing
Class C1: Hotels & Hostels	Hotels
Class C2: Residential Institutions	Homes for the Elderly, Children etc. Nursing Homes Hospitals
Class C3: Dwelling Houses	General Purpose Houses & Flats Sheltered Accommodation
Class C4: Houses in Multiple Occupation	Shared houses or flats occupied by unrelated individuals as their only or main residence.
Class D1: Non-residential Institutions	Health Centres Surgeries Churches Primary School / Nursery Schools Secondary Schools Colleges of Further education Libraries Assembly Halls e.g. Community Centres, Unlicensed Clubs
Class D2: Assembly and Leisure	Leisure Centres Sports Clubs Assembly Halls e.g. Bingo Halls

Note:

1. Certain uses within this document do not fall within any specific Use Class and therefore must be dealt with separately (see general uses) e.g. open air markets.
2. The Standards have not been defined in terms of the 1987 Use Classes Order as this would lead to wide ranges of recommended provision, e.g. Class B1 business encompasses some office uses and industry. A standard anticipating this interchangeability would be very wide and therefore, standards are only given for specific land use concerned e.g. office or industrial use.
3. In view of the interchangeability of uses it may be necessary to impose restrictions on development within these wider classes in order to reflect car parking requirements.



The Vale of Glamorgan Council
**Directorate of Regeneration and
Planning**
Dock Office
Barry Docks
Barry Cf63 4RT

LDP@valeofglamorgan.gov.uk
www.valeofglamorgan.gov.uk

**WRAP
AROUND**
residents' action group

york pl • 8 streets around

8 romilly rd, barry CF62 6AZ
m 07842 218 545 / 07970 669 713

Dear Rob Thomas

Re: Vale of Glamorgan Council **consultation on Draft revisions to Planning Policy**

This is our neighbourhood response to the draft policy, with a particular focus on Parking, although we also propose changes we feel are necessary within the wider Planning environment. We are writing to you as Managing Director of the Council, because we feel a number of the issues raised require your attention.

In our paper, we focus on **Social Sustainability** and cover a number of areas under the following headings:

Introduction

A. Background and principles

B. What happens in practice?

C. The learning we need to draw from specific example

D. Proposed changes to the draft Parking Policy, paragraph by paragraph

E. Other recommendations (to follow)

We appreciate the support that Barry Town Council, The Governors of Romilly School, the Vale of Glamorgan Planning Committee (regarding the United Reformed Church), our local Councillors, our Assembly member and local Business Leaders have shown in wanting social sustainability to feature appropriately and strongly in planning decisions and the Planning agenda.

This is a constructively critical document. Some may find it challenging but without honest and incisive evaluation we cannot know what needs improving and in which areas.

If there is anger behind some of the responses, it is born out of our frustration at wading up Porthkerry Hill with the backwash from the rising tide of a '*not listening to the calm voice of reason*' planning environment running down the kerbside, carelessly and intentionally washing away our social sustainability; trust us, the anger is authentic.

We go into appropriate detail in the paper but briefly for now, to highlight why we felt this before and feel it even more strongly now; you will remember two and a half years ago, that the Planning department and Highways steadfastly sided with the stance of the developer. They recommended the massive URC over-development for approval and pretended our neighbourhood had nothing to worry about. This was regarding our social sustainability amenities, especially parking, also privacy, traffic, pedestrian safety etc. Yet recently, with regard to parking, they now declare:

"The area in general was very heavily parked; a situation which was likely to worsen when the existing church building [the URC Windsor Rd] located on the south-western corner of the junction was converted into 22 residential homes of 1, 2, 3 and 4 bed residences and office premises for up to 160 office workers, with no off road parking facilities"

Page 11 of the Cabinet minutes 5th November 2018

How can it all of a sudden worsen now...but despite what we told you, the free objective evidence we provided you with, you couldn't see it would worsen, then?

Since the refusal of the application for the Nursery at 28 Windsor Road, how did it get sufficiently better for Planning to recommend approval of the URC, a refusal by the way which was based on:

'...commercial use in a primarily residential area where the significant traffic generation, vehicle movements and on-street parking would have an unacceptable impact on the amenity and character of the residential area and would be detrimental to highway safety' All things which apply even more so to the URC corner.

– and of course the truth is it didn't get better, it has inexorably got worse – as our research based evidence and your own minute shows.

Had they been consistent, the planning department had no business recommending approval then; according to the minute, they have even less reason now. To add insult to injury, the TRO is going to reduce parking in our area still further – but this didn't get taken into account as Planning used their algorithm. Regarding our mounting anger, authentic is putting it politely.

It will not be enough for the Council to receive representations and say that a box has been ticked and therefore **'The community the Council serves were consulted'**.

We want proper involvement, face to face discussion, a willingness to answer direct questions with illuminating answers and as a result to forge stronger links between residents and the Council, and across the community.

The choice is either introduce real improvement, proper engagement, full and frank involvement, and a genuine positive collaboration with the community...or resort to the harmful and dysfunctional old ways of lip-service and jobs-worth box ticking.

Despite everything, we would still rather seek positive co-operation and real engagement with the Council.

We wish to continuously improve our neighbourhood and thrive, and we aim to achieve this come what may – but we cannot do this as well as we would wish, without you. The question is, are we being driven towards Passport to Pimlico territory; or does the Welsh Assembly and our local Council share the same wishes for us and all neighbourhoods, too?

Rob Thomas, please let us know soon when you would like to meet, and in the spirit of constructive collaboration and wholehearted engaging with the community involvement, it would be sensible and helpful to do this before any decision is made on the draft Planning policies.

Yours Sincerely

The WRAP Around Working Group – on behalf of the wider WRAP Around community in the West End of Barry.

Richard Platts, Jane Platts, Adrian Taylor, Tracy Taylor, Roma Calderbank
Francesca Kitchen, Philip Kitchen, John Walters and Laurence Blight
CC

Barry Town Planning Committee
Ward Councillors
Assembly Member Jane Hutt and Alun Cairns MP
Planning Minister in Wales
Local Business Leaders
Chair of Romilly School Governors
Members of the Vale of Glamorgan Planning Committee

WRAP Around Residents' Action Group

Introduction.

In the matters covered in this paper, we represent over 300 households in the densely populated residential neighbourhood, the WRAP Around area which straddles Porthkerry Road, Barry. WRAP Around was formed 3 years ago because it centred on the residential roads near the former United Reformed Church, Windsor Road. It includes parts of both Baruc and Illtyd Wards.

It has been drawn up in response to the Vale of Glamorgan Council draft parking policy, presently out for public consultation. It follows on from a brief and positive discussion at Barry Town Council Planning meeting, which Councillors from our two Wards and members of the WRAP Around working group attended on Tuesday 29th January 2019.

It is written from the residents' perspective and is based on our practical experience of the present Planning environment and process. It is intended to illuminate why planning policy and process needs to change, and recommend the way in which this should be done.

As a group of positive but concerned residents, we would welcome meeting and working with our Assembly Member and the Planning Minister, the Council and Planning to achieve improvements to the benefit of all. We already meet with our local Ward Councillors who have been most helpful and engaged all along.

A. Background and principles.

From a Government and strategic perspective within the Planning environment, as is true for all public sector areas of endeavour, there is a desire to improve continuously. This is just as desired by those living, working and running businesses in the community i.e. those whom the Council seeks to serve.

We argue it is not enough to look at a draft written planning policy in isolation; we also need a system wide approach, to include:

- An objective evaluation of the current policy it is intended to replace,
- An independent review of how it worked in practice, e.g. did it deliver on the principles and the promise, were theoretical safeguards sufficient in practice, etc.?
- Identifying what needs to improve in the framework and words of the policy,
- A transparent assessment of the steps in the process through which it is enacted,
- A review of the culture in Planning and the behaviour, judgements and decisions of those 'running' the process.
- Recommendations for improvement

It will not serve the public good if the consultation produces only a tweaked written policy underpinned by an unchanged and inadequate process and/or planning culture because from our experience, it will still have a tendency in the case of challenging proposals, to produce an unintended sub-optimal outcome.

From our observation as lay people, amongst other things, alongside the technical requirements necessary for the built environment, we see the system of planning policy & process and the standards adopted, as having a focus on a number of tasks:

Enabling, protecting, permitting, controlling, assuring, communicating, informing, engaging, responding, avoiding detriment, and sound decision making; also to provide guidance to aid developers produce fit for purpose proposals, that comply with the Planning policy.

At its core, where proposals are mooted for densely populated residential communities, planning should be centred on ensuring such proposals are of measurable benefit to current and future residents; not as articulated in a promotional marketing brochure but in the judgement of the residents themselves.

The aim of any policy in the public sector is to serve the public 'good' and in the case of planning proposals, to enhance and improve the neighbourhood in which the development is sited...or at the very least do no harm.

1. The framework informing a policy when it is applied through the planning process, should be even handed both in:
 - Enabling a proposer to do what is intended, as long as what is proposed meets specific criteria, as long as the criteria are sound;
 - Ensuring that what is permitted meets the criteria intended to protect the 'rights' of the existing community and the amenities they currently enjoy; and as long as these criteria are also sound.
2. In seeing an application in isolation, the planning consideration is concerned with the permissions that can reasonably be given to a proposal, such as abiding by structural, environmental and other technical rules and good practice.
3. In seeing a proposal as being part of the adjacent built environment and street-scape the consideration is to ensure that the impact of the proposal is not to the detriment of neighbours or the wider community.
4. This should not be a difficult balancing act, it is simply about decision making, and the right to make them in the interests of all concerned; if the policy and the process is fine – so too should be the decisions, as long as the Planning culture and behaviour is healthy.
5. Nor should this act need to be about balance, rather it should be about developers proposing developments which meet the technical and policy criteria...and will do no harm.
6. In what they propose, and when looking at sites within an existing community, developers need to be '**good neighbours**', playing their part in sustaining quality of life, preserving safe and continued access to the amenities currently enjoyed by existing residents. When they achieve this as is required by Planning Policy, they will

have robustly demonstrated real support for social sustainability; which includes parking.

7. This is not only for the benefit of those already living nearby but also the future residents of the site they are seeking to develop.

B. What happens in practice?

8. If the decisions taken concerning proposals including when they are given approval, are widely felt to be reasonable, that is good. Many planning applications are already fit for purpose, uncontentious and do not have a negative impact on those living next door or nearby. These should be checked and passed without delay, letting people make improvements to their homes with the minimum of fuss.
9. But sometimes it is clear that a proposal is contentious and the decisions the proposer has made in drawing up their plans are considered poor or simply wrong, i.e. are against the spirit or specifics described in adopted policy, yet despite this and for whatever reason, sometimes such proposals have nevertheless been endorsed by a council's planning department.
10. This can be because of the attitude of the proposer, the person or persons in Planning who make the decisions at each step of the Planning process - or it can be because the policy and underpinning process which guides their behaviour is not fit for purpose...or all three.
11. In a robust and well managed system, there should be no problem with an occasional poor or wrong plan or decision, because safe provision of timely Overview and Scrutiny during the critical path of the process should be active in correcting these, **before** they even become part of a Planning Department recommendation, far less set in stone.
12. In 'Lean' and Checklist terms this sort of outcome should be a 'Never Event' i.e. one which is easily avoidable and should never happen. And it would not, if the checklist used and the decision making tree adopted were robust and inclusive, rather than leaning Pisa like towards favouring the wishes of the developer.
13. The trouble with the current Planning Policy and process is that firstly, no such check and balance steps are in place or if they are, we see no evidence of it. There appears to be no separation of roles and/or behaviours between guiding the particular

application through the steps of the planning process and those at the highest level (and far too early in the process) deciding to enthusiastically recommend approval.

14. Just as worryingly, with regard to the Planning process in action, while the content of paragraphs 2 and 3 **both** need to be met to produce an inclusive and fair solution for both the developer and the community; we have found that 2 and 3 are seen as competing. This is not in the spirit or the intent of Planning Policy.
15. Furthermore, in our experience the way in which this artificial and unnecessary competition is decided, favours the developer unfairly.
16. We searched for the part in the Planning policy which says you can either have development or Social Sustainability, **but not both**...we were unable to find it; strangely, we can now see evidence that this Catch22 either/or outcome, which in Planning Policy terms should be a 'never event' - exists at the end of our road.
17. In the current policy, there is confusion and misalignment between:
 - Long term aspirational thought and high level strategic thinking which appears to have an apparently desired direction of travel towards a goal, at which some stage in the future, society may arrive (fewer cars)
 - The practical policy elements which are necessary for **current** demand and supply for parking i.e. in implementation and which include the protection for those living nearby, of the amenity they currently enjoy.
18. The use of the terms minimum and maximum in describing the provision of vehicular parking for new developments or re-purposing existing buildings is arcane and particularly (and possibly purposefully) vague and unhelpful.
19. There has been a drive, to move away from requiring a specific number of parking spaces per dwelling, towards saying that, the number that would have been required in the past, may no longer be needed by the residents occupying the new dwellings; be the proposed development a new-build, or to re-purpose existing buildings.
20. It is clear that Social sustainability **is** met if a developer can robustly **prove** the actual demand **will** be at a lower level, can identify what this will be and can show this will be **enforced**. **If** there is sufficient parking place provision provided by the developer

which allows the new residents/owners to live in harmony with their new neighbours, we would agree that this can be - so far so good.

21. However the process or set of rules presently used to make the calculation, i.e. the algorithm which is part of the current planning policy, is **stunningly inadequate**.
22. The theoretical criteria in the process and the way in which those involved in the present planning culture choose to apply it, can result in there not being enough parking places provided by the developer in practice, to meet the actual demand generated by a particular proposal.
23. This is evidence enough that the policy confuses aspiration with practical consideration and prefers an algorithm based desk top exercise, to the facts, i.e. **the known reality on the ground**.
24. There can be no circle to square when the calculation is based on a false premise or is conducted in a myopic planning culture which is willing to show such a one sided '*we can't or won't hear you, and despite your compelling evidence we will not do anything differently*' manner.
25. **The important result for current residents is that this can negatively impact on the Social Sustainability of the existing community, in a way that other parts of the same policy specifically state must not happen.**
26. When this occurs, it is difficult to conclude other than there is a bias against a genuine '*sustainable good of the community*' agenda...and/or the policy has not been well thought through, or it is being miss-applied, or all three at once...thus producing these unintended consequences; which makes us wonder if the negative and 'against policy' consequences are actually unintended.
27. We note that during the September 2018 Planning meeting, the committee....'*discussed Indicator 9 on page 44 of the report papers, which detailed the percentage of Member made decisions against officer advice*'. One of the members stated...'*that it was a duty as a Councillor to challenge officer decisions where she saw fit...*' We haven't referred to the actual table, but imagine it was raised because of where the Vale of Glamorgan sat in the league table.

28. As a group of residents concerned with these matters and feeling unprotected by the Planning process and patterns of behaviour we have witnessed, we salute the Elected Representatives who speak out about things which they feel are just not right...or just; crucially, this checks and balances role happens at the wrong time in the process.
29. If a Planning Department recommends approval all along, but then finds the proposal unanimously rejected at committee, as we demonstrate later, this will subsequently weaken the case for upholding the refusal at Appeal...because Planning Officers had mistakenly or for the wrong reasons, recommended approval all along.
30. If Committee Members are challenging the recommendations of the Council officers more than in other Authorities, perhaps the better enquiry would be:

Why is Vale Planning advice showing poor consideration of a proposal's future implications to the local community, and recommending substandard schemes for approval...so often?

C. The learning we need to draw from specific example

This section shows objectively why the policy and process are not currently fit for purpose. Using a real example, it identifies the inconsistencies and conflicts within the planning environment, and lays out the learning points as a guide to where the policy and process must change.

31. The WRAP Around experience is based on our fight in seeking to protect our neighbourhood from being overwhelmed by the massive over-development of a local church for residential and large scale commercial use with no parking provision; **the Vale Planning committee in formal session, unanimously rejected the proposal. (A decision which we applaud and for which we were/are truly grateful)**
32. In the light of Planning Policy, we were bemused by the recommendation to approve from the planning officers, in contradiction of their own policy; also in contradiction of their previous decision to refuse a Nursery proposal a short distance away, at 28 Windsor Road – which had been refused for exactly the same reasons we were putting forward as being material in the case of the much larger development of the URC.
33. This residential area is devoid of 'spare' parking at peak times, and the URC and particularly the entrance to the site, is in a more exposed and potentially dangerous location, regarding the street-scape, i.e. traffic, road and pedestrian safety and vehicular movement etc. This unexplained volte-face is what first gave rise to our doubts about the whole ethos of the planning set-up.
34. In our attempt to understand this, we repeatedly asked specific questions of the Head of Planning and Regeneration, the Managing Director of the Vale Council and the Head of Highways and other planning officers. We found the Planning culture and processes in place foiled our proper engagement in seeking to have answers to our simple and reasonable questions.

35. Just simply understanding 'planning' which was for us a new and confusing environment was made more difficult by this and by the deflecting and 'stonewall' type behaviour we encountered.
36. Those we met and wrote to, while always courteous and polite, could not or would not explain how they came to the decision; or why they felt we were wrong in our material factual evidence, our assertions or our conclusions...unlike the whole of the Vale Planning Committee, who clearly felt we were right.
37. While our evidence was objective, robust and praised at committee, the developer's had fantasised about 24 parking spaces which were not there, yet the Council Planning Department had not challenged this – until we raised it.
38. How many other schemes have got through the current planning policy and process 'on the nod', backed by shoddy, biased and misleading surveys, because there was no challenge from planning, and no organised residents' group challenging it? **We were unable to get the sense that anyone was performing the 'honest broker' role...and certainly not in Planning, or at the Council Leadership level.**
39. Any ubiquitous person passing on the Barry Omnibus looking down at this scenario would question if the Council was doing the job as well as it needed to, and probably conclude that the policy, process and culture are flawed.
40. **This is important because the things we were asking about and challenging, to which we got no answers, were material to our argument and the protection the Policy specifically afforded us and our neighbourhood.**
41. The slippery data and fantasy parking places were included in the algorithm which 'allowed' the Planning Department and the Developer together to agree on an unreasonably small number of parking spaces as 'being required' to be provided, despite our practical evidence. Yet even these are not being provided – due to something called fall-back...another factor in the algorithm and process.
42. When we reviewed how fall-back was utilised by Planning and the Developer, and did an in-depth research of the use of the concept across the country, we provided examples which were pertinent to the URC. We demonstrated that it was illogical and

irrational to apply fall-back in isolation and in the case of the URC, the local context clearly shows that the outcome would be untenable.

43. This was to a significant extent because of the layers of Planning decisions taken over the years in the area, in which Planning, when making each of their previous decisions, acknowledged they had allowed with insufficient parking provided by the developer, anticipating incoming residents would be able to take up the slack, which we contended and proved is now saturated, a proof accepted by the Vale Planning Committee.
44. Previously Planning Inspectors had drawn attention to this very aspect when commenting on earlier developments near to the URC.
45. However, it was also because the calculations regarding the previous Church use of the slack, which used to be available, did not represent the actual usage or availability.
46. Based on our research, we calculated the church used about 100 hours a week of parking time, whereas the proposed use will require over 5,900 hours a week.
47. This is a massive and material increase of 5,800% in intended usage of parking spaces, which are just not here on our residential roads. (see Cabinet minutes as recently as 5th Nov 2018, which confirms this)
48. **Because of the significant change in use, the number of parking spaces needed for use by the proposal is not 'roughly equivalent' nor is it in anyway comparable or tenable. Knowing the Planning policy, and the intricacies of the Planning environment far better than we, the whole of the Planning Committee of the Vale Council agreed.**
49. If social sustainability is desired and is to be preserved as Planning Policy dictates it should be, this aspect alone should have required the Vale Planning hierarchy to **recommend refusal but they did not, why?**
50. **The result is the imposition on our neighbourhood of a 'Never Event' - which should never have happened.** Planning process, culture and patterns of behaviour need urgent revision.

Please stick with this – the next bit is quite detailed but is a reminder of the good work we carried out as residents living in this area, in providing an objective evidence based '*reality in our neighbourhood*' picture for the consideration of the Planning Committee...and which early on, was brought to the attention of Planning Officers.

51. In the most important aspect of Social Sustainability, we demonstrated that:

- The current vehicle ownership in the WRAP Around neighbourhood averaged 1.7 vehicles per dwelling. This was from a practical house to house survey. This data was supplied to the Planning Department and not challenged, despite meeting face to face – yet crucially it did not feature in their use of the algorithm.
- That this level of 1.7 was the same for the most recent church conversion across the road from the URC site; in other words despite the advantages of bus-stops, shops, train-stations and steep hills up which people might choose to joyously cycle...the so called 'sustainable' nature of the location still resulted in very recent incomers having and needing to park an average of 1.7 vehicles per dwelling, matching the existing community average vehicle ownership.
- The detailed data we shared with the Planning Department showed we had measured the kerbside available for parking and compared this to the presenting need from existing residents. **We demonstrated that at peak residential times there is no spare capacity: all kerbside parking spaces are notionally allocated.**
- We did this in two ways; as part of the calculation which multiplied the number of dwellings x1.7 vehicles and by 6 metres...and divided the result into the measured kerbside – and also by publishing authentic photographic evidence of our chock-a-block residential roads at peak 'residential use' times...an outcome endorsed by the opinion formally expressed by both South Wales Police and Highways.
- We note that our 1.7 vehicles per dwelling is lower than the level described in the schedule within the planning policy, disproving we may have been trying to inflate need beyond that required or the standard, unlike the Developer who tried to deflate his own probable demand and inflate supply. This was compounded by the

collaboration between the Developer and Planning, who working to describe the demand from the proposal together, between them coming to and 'agreeing' a figure which Planning were happy to endorse in their recommendation to the Planning Committee, when they already knew from our evidence that it significantly understated demand: The question is - why would they be happy to do this?

52. In the context of a culture that told us it wanted our involvement and engagement, it was these facts and a myriad of other things we put to those responsible for the Planning process, but sadly and inexplicably, no answer was the stern reply.
53. If it is true that the current process does not require them to answer; it is not fit for purpose.
54. This is enough to indicate that the current planning set up is significantly awry and in this instance, contained a bias to which the Council was alerted early on and, in the public interest, about which it should have taken decisive action; the lack of balance should not have been ignored and tolerated.
55. On behalf of those voicing concerns, we were the organisation which made the compelling argument in front of the committee, where we contributed to enabling the committee to reach their own conclusions individually and their collective decision to refuse. At Appeal we asked for but were denied a Hearing (the Ombudsman queried why the reasons were not made clear). We were also denied involvement in the final stages of the chosen appeals process.
56. In this we found that our authentic voice of challenge to the scheme had in effect been taken over by the very same Planning Department which had at the highest level recommended approval all along. In our part of the Hamlet of Barry we were starting to feel there was something rotten in the state of...the whole Planning set-up and culture; we hope you can see why on this evidence, this system needs to change.
57. To us it is clear that some of the key decisions on the URC case were illogical and irrational, and were not according to Planning Policy – or any fair-minded view, but they were made notwithstanding. And, despite our repeated attempts to elicit

answers, we have never received a response, let alone a frank discussion and a satisfactory explanation.

58. Because there is a lack of real transparency, we are unable to determine if our concerns about bias and lack of fair-play are groundless; we are not privy to the checks and balances which should be in place to ensure good governance and probity.
59. Reassurance was not on offer from anyone we met – honest, healthy and open discussion was never on the table. Confronted with these behaviours it is easy to see why we felt there was little or no illumination...how can we tell if there is or is not an elephant in the room, if the window we look through darkly to fully understand the process, is heavily obscured planning culture glass, unlike those recently fitted, contrary to the conditions made for approval of the URC conversion, regarding Neighbour Privacy?
60. Sadly, we know from our experience there is a policy or at least a Planning and possibly a Council wide 'culture' norm, to not respond with clarity or openly, presumably in the hope that people like us will tire and go away.
61. **We are still here – and still feel we deserve answers to the questions we have asked from the Council, including Highways and their Planning Department.**
62. From everything else we have identified, irrespective of the uneasiness expressed above, - **we feel that this particular planning pendulum has swung too far and it is time for changes in policy and process to restore confidence and balance.**
63. When it went to Appeal, in a partial, flawed, unhelpful process, from which we were excluded at the crucial part, we experienced the same from the Planning Inspectorate, i.e. a steadfast refusal to answer our questions, and to round it off, we had similar from the Ombudsman's Office although they did provide one small crumb.
64. We are told that 'a system is perfectly designed to produce the outcomes it produces'; poor outcomes such as these, must therefore come from poor systems.
65. Albert Einstein said that: **'The definition of insanity is to do the same thing repeatedly and expect a different result'.**

66. From this, it follows that in the future, when proposals do not comply with the Planning Policy and are definitely not in the spirit of protecting social sustainability...they will nevertheless squeeze through, because of inadequate policies, poor decision making and a fundamentally flawed process...**unless changes are made.**

67. Following the URC Windsor Road Appeal decision, in formal submissions to the Planning Committee, Agents for Developers are already quoting the unacceptable URC outcome visited upon our neighbourhood, as being evidence of why objective and reasonable resistance to the lack of or no provision of parking in new proposals is useless; despite policy supporting resistance/rejection and that in many cases, including the URC proposal, a planning refusal would be in line with the intended protections in Planning Policy.

68. So, despite Planning Policy requiring that social sustainability be protected, the precedent for the opposite of this has now been set. Zero parking provision is now acceptable despite the Planning Department saying that *'they base each proposal on its own merits'*...when they knew full well that the concept of merit and the URC proposal are incompatible. We asked for examples of similar sized developments which were allowed with zero parking provision; we were given no examples or cases of this.

69. To be clear, we have always said that we wanted the URC developed in a way which is 'sustainable' for everyone, including the existing community. However, everyone knows that:

- 22 dwellings with 37 double bedrooms, (42 car parking spaces)
- and offices capable of taking well over 100 staff – (25-30+ car parking spaces)
- and providing no parking whatsoever; (together needing 60-70 spaces at least)
- with the density of need which is already required, i.e., that which is needed to sustain the amenity enjoyed by existing residents;

- is unsustainable. When we say everyone, we mean everyone except the Head of Planning and Regeneration. Again, we refer you back to the November 2018 Cabinet minute – it echoes the authentic description we have all along provided.

70. The planning process used, enabled the Developer & the Planning Department to conjure parking spaces which are just not there and spirit into nothingness the real demand arising from existing residents and the proposal, and to bizarrely recommended approval, against their policy, the wishes of the community and as it turned out, their own Planning Committee.
71. This unsustainable recommendation to approve made it very difficult for a department from within the same Planning set-up to argue in front of the Planning Inspector that the refusal should be upheld at Appeal. In fact the Planning Inspectorate said that the Council provided 'no additional material to support upholding the refusal'; and why would they, when the most senior echelons of Planning had, despite the overwhelming evidence and case for rejecting the proposal, recommended that it go ahead, all along.
72. However, for a moment drawing back and seeing this from the position of Overview and Scrutiny, at this stage, the Planning Department **should** have fought tooth and nail to **uphold the refusal** – because their job was to robustly represent the will of the community, as voiced and voted on by the Vale Planning Committee. They could not or would not include the best evidence available to do this, the WRAP Around papers specifically prepared for this stage of the Appeal process and all our other submissions...because they had purposefully ignored them all along. Nor would Planning and the developer ask for an Appeal Hearing, which would have been in order because of the strong public interest. They both knew we would have robustly put the case for upholding the refusal, in line with the decision of the full Planning Committee – and we would have faithfully represented the concerns of our neighbourhood.

73. Had a Hearing been held, we would at least have been in a forum in which we could encourage the chair to insist on answers to the questions we had been asking all along.
74. A system which allows two parties who are both 'for' a course of action which favours them, to decide on the method of Appeal to be adopted; knowing that a third party (*Interested parties i.e. in this case WRAP Around etc.*) which opposes what the first two parties want to do, will be excluded from the final stages of the written reps method they have chosen; is patently unfair.
75. The Planning Department, the Developer and the Planning Inspectorate all knew that the chosen method was far more likely to give them a smooth reversal of the decision of the Vale Planning Committee...as we were advised would be the case before the Appeal was submitted, by a planning expert.
76. We asked the Planning Inspectorate to re-consider the decision for written reps, they declined. Why, we were never told.
77. Our attempts to have our submissions included, to the later stages of the unhelpful Appeals process, - ended up with them being totally redacted, no one gave us a reason why. This smacks of an unfair Appeals system, following on from poor separation of function, poor governance and an inadequate process.
- 78. As those most affected by the way in which this issue was decided, but purposefully excluded from this part of the process, the frustration at the woeful inadequacy of the process and the outcome was keenly felt.**
79. It felt like we were watching a John Cleese training film on how not to do Planning, Governance, Overview and Scrutiny, Communication, Involvement, Appeals etc., in short, how not to properly serve the public. We felt you could not make it up – but sadly they did...and it is all too real; we'll now have to live with the consequences of this fundamentally poor process, culture, recommendation and the outcome for the rest of our lives.
80. You might see this as sour grapes and being poor losers...before you decide this, ask yourself if you would like 22 dwellings and offices with up to 160 staff plonked next

door to your home...with no parking provision whatsoever? Where would your own and your neighbours Social Sustainability and amenities be then?

81. Notwithstanding the passion such events stir in a community, we have taken the trouble to describe the above; it is offered as a gift – particularly for the purpose of illumination, to identify what needs changing and because we still want answers.

82. Within the prevailing rules and without the funds to launch a legal challenge, we recognise we cannot undo the decision, however irrational it was.

83. **But we can do our utmost to strengthen for the future; those parts of the Planning environment which are intended to look after existing communities...and failed to do so in this case.**

84. **We don't see why any other community or neighbourhood should have to tolerate such an inadequate outcome.**

85. Based on this one but significant experience, added to by those who have recounted similar frustrations - and for all the reasons above, we believe it is crucial to protect the amenities for those living in our built environment, particularly in our residential neighbourhoods.

86. **There is a country mile between being protectionist or NIMBY-ist, and seeking reasonable fair-play and the protections specifically included in Planning Policy; and if they are not sufficient, to expect and demand changes be made.**

87. If we are to achieve our aim which the Council should want just as much as we do, which is:

- Improvement to policy, process, standards, values and just as importantly, patterns of behaviour; and therefore to our neighbourhoods -

an overhaul of the whole Planning environment is long overdue.

As a start, the next section seeks to address the above points by recommending changes to one part of this, the draft policy.

D. Our comments on the sections in the draft policy

Response section by section to the Parking Standards SPG – Draft for consultation issued by the Vale of Glamorgan Council (December 2018)

1.1 Car parking is a major influence on the choice of means of transport and the pattern of new development. If car parking is readily available people are more likely to opt to use the private car instead of more sustainable forms of transport. Car parking has always been a major element of land use planning and development and through parking standards and guidelines, local authorities have sought to control car parking in order to improve the environment, reduce congestion and to encourage a shift to more sustainable modes of transport.

This smacks of un-sustainable and unrealistic social engineering, and it in no way reflects what each neighbourhood is experiencing, right now; which is where the impact from planning decisions made now will be felt.

Car ownership is on the increase:

- The proportion of households with access to a car or van went from 14% in 1951 to 75% in 2010(Department for Transport)
- The proportion of the eligible population with a full-driving license went from 48% in 1975 to 71% in 2010, but with the increase in overall population in this period this has resulted in 3.9 million more license holders (DfT)
- And locally, in the 10 years 2001 to 2011 car ownership went up 12.8% in the Vale of Glamorgan (RAC).

These are hardly trends which give confidence that people will be happy not to bring cars to a new development.

We expect that everyone involved in writing the draft presently out for consultation, has a private vehicle at their disposal, will have driven to work to write it and driven to meetings to talk about it – and driven home at the end of the day to park as near to their home as possible. If any dedicated individual has cycled or used a different mode of transport – that

is good and it is their choice...it has we hope, not been part of coercion or forced upon them...free will is we trust, in play.

Nearly all the people who we met in the Council during the first phase of our WRAP Around Campaign had driven that day to work, admittedly two had caught the train, which stops immediately outside their offices...but they subsequently acknowledged that their car was parked outside their home, waiting to be used.

Despite their admirable so called sustainable journey to work, no one had reduced their parking by their home because they did so, which bizarrely the interpretation of policy does, when assessing the amount of parking required for proposed developments. They have a car because it affords them the opportunity to do the things in the bullet points listed below when the mood takes them.

A personal perspective, one of the residents in our community says:

'If I had not had a car, I would not have been able to do the job I was required to do, I wouldn't have earned my salary, be in receipt of my pension nor would I have been able to pay my taxes including council taxes – which fund those serving our community, who write these draft policies.

Furthermore, because I live in a so called 'sustainable' place, the algorithm would have been informed by an assumption that I would not have a car'.

There is nothing to stop people wishing to have a car, and if they use their hard earned money to buy one and then wish to use it – it should be no part of policy to actively discourage them from doing so...or to insist they experience the negative effect of Social Unsustainability by 'forcing' poor outcomes from planning decisions upon them.

We are perfectly happy with encouragement and agree this is what is needed, not the mindless repetition of the stunningly slippery ill-defined word 'sustainable' when trying to slide something which is unrealistic and untenable through blocked by illegal parking back-door clauses, in policies or byelaws.

It is a different matter entirely if the transport authorities provide brilliant services which meet peoples individual needs and which result in people wanting to use them, which encourages people to voluntarily leave their cars at home (like the people we met in the planning department) – to use for those journeys which the transport authorities do not provide for, such as:

- Doing a job which requires mobilisation through the day, or where one's place of work is not on a transport route, or where the frequency of public transport does not fit with shift patterns or a car is needed for the flexibility required by employers
- Going to hospital, particularly in urgent or emergency scenario, but also when visiting
- Visiting relatives who live off bus or train routes
- Using the finite time available to do things efficiently and effectively, not waiting around for buses which do not turn up, or which are so infrequent as not to fit the bill
- Visiting B&Q/IKEA and other DIY/Flat pack or similar stores
- Driving to the recycling centre, which incidentally you are only allowed to drive private vehicles to, as you are not allowed to 'walk-in'
- Going on holiday, etc, etc.
- Doing the weekly shop in the supermarket, where readily available car parking is provided...

If they do not believe parking is necessary or desirable, why has the Vale allowed the building of large car parks at Tescos, Morrisons, Waitrose, Lidl and most recently ASDA's ? Surely this implies that a lot of people will have cars, a lot of people want to use them – and while there are those on bus routes who also shop 'by bus'. Through anyone's observation of usage, the provision is still evidently desired by the community...who are the people the Council and their officers should be seeking to serve....remembering that a discrete section of those parking at the stores is made up of a significant proportion of council employees.

If the Council serves the community adequately, and looks after all residential neighbourhoods well - then it also follows that the vehicles which visit the supermarkets etc., needed somewhere to park before they left for the shops...and according to the Planning Policy, will need somewhere near their home, and in line of sight of it...when they get home.

Everything connects; this willingness to see the whole connected and holistic picture is a key tenet in the Council playing their crucial part in ensuring social sustainability for me, you, us and everybody.

The remainder of section D is laid out with specific points we wish to make regarding sections in the draft policy. The Planning Policy draft is shown in italics (12pt), under which are our responses which are in normal font (13pt) and start with **WA Note:** for WRAP Around. For easier screen reading the issues we identify are in a different colour.

1.2 (Bullet points)

- *To assist developers, designers and builders in the preparation and submission of planning applications; and*
- *To achieve a common approach to the provision of vehicle parking facilities associated with new development and change of use.*
- **WA New bullet point:** To ensure the amenity of parking, enjoyed by existing residential communities is sustained, and/or enhanced, in accordance with the provisions for Social Sustainability within Planning Policy.

WA Note: Improving the environment is one of the principles for planning, hence the inclusion of 'and/or enhanced'

This SPG has been prepared to expand upon the policies contained within the Vale of Glamorgan Local Development Plan 2011 – 2026 (LDP) and reflects the requirement set out in Planning Policy Wales (Edition 9) for local authorities to adopt parking standards as SPG and keep them under review (para 8.4.3refers).

2.2. The guidance sets out the Council's parking standards for new development (including change of use) that are both consistent and transparent. Parking requirements are detailed according to land use and location and list requirements for commercial vehicles, cars, motor cycles and cycles.

WA Note: The use of the term 'transparent' cannot be applied to the vagaries of the use of 'maximum now: minimum before'. Nor to the algorithm used, nor the process, nor the communication, nor...a number of other aspects of planning conduct. Peppering documents with 'sustainable, transparent, and consistent' is a waste of ink if there is no intention of delivering to the satisfaction of those served, i.e. this includes the existing residential community.

2.3. The guidance also provides information in respect of how the preparation and adoption of travel plans and/or the location of the proposed development in relation to alternative sustainable modes of transport and local services and facilities may be taken into account in the level of parking provision required.

WA Note: What status does a travel plan have in law? Is it enforceable and how would this be done? How does it impact on a potential purchaser of a new property on a particular development, is it able to predict if they will either have or not have a private car for their own use? What recourse does the existing community have if access to their amenities is compromised, when the theoretical reduction in parking need, because of Planning taking account of the travel plan etc., does not actually materialise in practice?

WA Note: We wholly endorse the idea of using public transport, bikes, shanks' pony to mobilise and reduce pollution but the reality is that people still want to have a car outside their home to do the journeys they cannot do via public transport.

WA Note: We refer you to the evidence we provided re Romilly Quarter. In this case any amount of travel plans did not stop what has actually happened – a real average vehicle ownership much greater than use of the algorithm used by Vale Planning and Developers would suggest. The same as the average vehicle ownership, and therefore the need to park cars, and the physical kerb-space to do this, across the whole of the WRAP Around Community

WA Note: The wording should be:

...may be taken into account in the level of parking required, as long as the developer can demonstrate that the reduced level will be adequate for and fulfil all the needs for their development, and result in no over-spill. In the absence of this evidence being provided the unreduced level of parking per

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WB

dwelling per bedroom up to a maximum of three car parking spaces per dwelling, as shown in the table in section...[?].will apply

WA Note: The ethos here is, develop by all means but consume your own parking space. When the calculation of the level of parking generated by a development produces a level which is artificially low; compared to what in reality it is most likely to be; it would be wholly wrong under this Planning Policy to accept it...or to recommend approval of the proposal.

3. Status of the Guidance

3.1. This guidance was approved by Cabinet as a draft for public consultation on 3rd December 2018 (Minute No. C502 refers). The Council will consider the representations received during the consultation exercise before finalising the document for development management purposes.

WA Note: As part of our response we have asked earlier in this paper to be involved in this process through face to face discussions and genuine collaboration in a meaningful manner. i.e. for the avoidance of doubt, before any finalising of the Planning Policy is done.

3.2. Planning Policy Wales (PPW) Edition 9 (November 2016) advises that SPG may be taken into account as a material consideration where it has been prepared in consultation with the general public and interested parties and is consistent with the development plan. Once adopted, the SPG will be a material consideration in the determination of future planning applications and appeals in the Vale of Glamorgan.

WA Note: ‘...where it has been prepared in consultation with...’ see our earlier notes on what we feel constitutes ‘prepared in consultation with’.

4. Legislative and Policy Context

4.1. National Legislation

4.1.1. The Planning (Wales) Act 2015 - seeks to deliver a planning system which is fair, resilient, enables development and helps create sustainable places.

WA Note: ...fair...and helps create sustainable places – we fully agree, but for fair the system needs a lot of improvement – see the earlier sections in this

paper. And the wonderfully much-peppered word 'sustainable'? Yes, as long as this includes **Socially** Sustainable, regarding the amenities currently enjoyed by existing residents.

4.1.2. Well-Being of Future Generations (Wales) Act 2015 - seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act contains seven well-being goals which local authorities as well as other public bodies must seek to achieve in order to improve well-being both now and in the future. It means that for the first time, public bodies listed in the Act must do what they do in a sustainable way and make sure that when making their decisions they take into account the impact they could have on people living their lives in Wales in the future.

WA Note: – Again, we agree in principle. However, taking into account the impact they could have on people living their lives in Wales in the future must also require doing no harm to those living their lives in Wales...**now!** We have pursued and promoted a Socially Sustainable agenda which is what Planning Policy tells us is our right. The experiences we have laid before you in no way suggest an improvement in well-being ...so they cannot be held to have delivered on '**both now and in the future**'.

4.2. National Policy

4.2.1. Planning Policy Wales (Edition 9) - Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. Paragraph 8.4.1 states that in considering their requirements for traffic management, local authorities should adopt an integrated approach and consider how different measures can complement one another and contribute to the achievement of wider planning and transport objectives, taking into account the needs of the disabled and less mobile sections of the community. Within town centres priority should be given to walking, cycling, public transport and delivery vehicles through the reallocation of road space.

WA Note: While we understand this point and broadly agree with the apparent aim, it must be seen in the context of :

- Technical Advice [should that be advice?] note 12: Design requirements for parking '...expectation of car owners to park near their home,

particularly their desire [that their parked car] be secure and overlooked [from their property]’

- ‘...a particular concern with reduced on-site parking is the problems associated with overspill parking’
- ‘Local Planning Authorities...should assess the extent of on street parking pressures and the impact of the new development’
- ‘...refuse permission for development – where despite controlled parking, unacceptable road safety or congestion issues would remain’
- Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.

From the extracts above which are from the various policies quoted in the draft planning policy, it is acknowledged that people will have cars and they will want to park them near to and within line of sight from their homes, which the policy specifically states is understandable and desirable...and if there is no unallocated notional allocation of kerbside parking spaces to be had, the last bullet point extract applies...*although not in the WRAP Around area, apparently...feel free to explain why.*

4.2.2. Paragraph 8.4.2 states: Car parking provision is a major influence on the choice of means of transport and the pattern of development. Local Authorities should ensure that new developments provide lower levels of parking than have generally been achieved in the past. Minimum parking standards are no longer appropriate.

WA Note: If directed at the provision of multi-storey parking in town centres, to parking provision near shops and super-stores and particularly out of town venues, again fully understood. However, rather than lower levels (what on earth does that mean?!) an adequate level with no unnecessary surplus would seem to fit the bill...or policy, as needed by both business owners and those,

i.e. you and me, when visiting their premises. We refer you back to the point we make above, at 4.2.1 You acknowledge in this policy that people will have cars and acknowledge there should be provision for them to park within sight of their homes. So, 'lower levels' is what, perhaps a subterranean car-park? It doesn't actually mean anything in real terms.

Technical Advice Note 12: Design (2016) - provides additional guidance and advice on enabling good design within the planning system. It recognises that parking is a consideration in design and developments should consider the requirements for parking and whether this will be managed appropriately. (our WA bold)

WA Note: Thank you. Why not use this as the starting point for the review and decision-making 'tree' for the parking component of all applications?

And for the avoidance of doubt, the word requirements does not refer to the Alice in wonderland type result from a let's make parking need disappear completely down this convenient kerb-side rabbit hole, calculation – it refers to a calculation of probable need trusted by all, in a particular location, based on robust evidence.

At paragraph 5.11.2 it states: Development proposals, in relation to housing design should aim to [inter alia] focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles.

WA Note: Again we agree – we like the idea that we focus on the person, the human space within their lived-in environment and not the vehicle and we agree this includes safety and good healthy living spaces, including an environment suitable for amiable ambulation.

However, if the vehicle is going to be in sight of their home (as policy says it should be) and they are likely to have one or two, and want to park as near to their home as possible (as policy indicates is reasonable) then from our experience and evidence we need a minimum of 5 and probably 6 vehicle parking spaces for every three dwellings, plus space for visitors.

To enable people to live their rounded life well, in every residential location – unless specifically excluded and known about and signed up to by those about to become resident, we need inclusive 360 degree holistic design, **including integral provision for parking** - *(Living a sustainable rounded life well, for many...includes 4 tyres and a steering wheel!)*

4.2.5. Paragraph 5.11.7 states: Where and how cars are parked can be a major factor in the quality of a development. Vehicles should not be allowed to dominate the space or inconvenience pedestrians and cyclists. At the same time, the needs of disabled people to park near their dwellings should be acknowledged.

WA Note: We feel that emphasising the positive and inclusive is more powerful:

Pedestrians and Cyclists will be considered first and with this principle in mind, the vehicular need will be properly assessed, well designed and appropriately accommodated.

A balance needs to be struck between the expectations of car owners, in particular the desire to park as near to houses as possible, to be secure and overlooked and the need to maintain the character of the development.

WA Note: Agreed – see the WA response to 4.2.4 above. However we add, the character of a development will mean nothing if those who buy the homes, bring more vehicles than will fit in the number of parking spaces, which have been provided by the developer. The plan should be to accommodate the number of vehicles incoming owners are **most likely to bring** and which they have every right to own and use, and park...near their own homes. *(Unless specifically forbidden as part of a contract they have freely entered in to.)*

4.2.6. Technical Advice Note 18: Transport (March 2007) - provides guidance on achieving a sustainable and integrated land use planning and transport system. Paragraph 4.1 states: Car parking can take up large amounts of space in developments, which decreases density and therefore can represent an inefficient use of land.

WA Note: Well actually, no. Density should be part of a holistic planning and provision approach to what prospective purchasers want. It is very inefficient and ineffective to provide fewer parking spaces than will actually be required...it is also not Socially Sustainable, as is required by Planning Policy.

It can also generate considerable additional trips if located in an area without public transport. Poor design and layout of car parking can also make it more difficult to provide effective, walking, cycling and public transport links.

WA Note: With regard to 'no public transport'...this is to do with a strategic consideration of land use, but it is also to do with the impact of the reducing number of buses available and reducing frequency. With regard to trains, perhaps Beeching as a Government Planner, was a little bit wrong after all. (Where is inspired long term strategic vision when you need it?!)

WA Note: A key component is the way in which people wish to be personally effective and make choices in their own individual lives. This includes how they chose to use their capital; buying and running a car is no small decision and has significant cost attached; millions make the decision to have a private car because it allows them to efficiently mobilise within their environment, and to exercise their right to freedom of choice. They may be contributing to a more sustainable future by using them less, walking, bussing, training more...but they still have a car.

4.2.7. The TAN makes it clear that maximum rather than minimum parking standards should be adopted. Paragraph 4.7 states: "In determining maximum car parking standards for new development, regard should be given to:

- **Public transport accessibility and opportunities or proposals for enhancement;**
- **Targets and opportunities for walking and cycling;**
- **Objectives for economic development including tourism;**
- **The availability in the general area of safe public on-and off-street parking provision; and**

- *Potential for neighbouring or mixed use developments sharing parking spaces, for example at different times of the day or week*

WA Note: Elsewhere we have questioned the usefulness of Maximum and Minimum as terms, there is much unhelpful confusion in their use and interpretation.

In the past, there may have been some merit in wanting to prise planners away from wanting oodles of parking spaces per individual dwelling on a development, but this Max and Min phase has now passed, the phrase is now inadequate and being used inappropriately.

As an ethos or description, you should give them their just deserts and scrap Maximum and Minimum, in application it is as robust as a jelly car parking space and clear as a blancmange bicycle.

The Developer should identify the realistic car parking space requirements, based on the number of dwellings and intended occupancy. This should be tested, based on the prevailing current car ownership in similar or adjacent residential areas, and also compared to vehicle ownership in similar types of development. *(See our evidence on URC Vs Romilly Quarter, which is a sensible, pragmatic and valid approach).*

For the long strategic view, what trend in ownership is occurring, when might this actually impact on this physical landscape and when?

In the meantime, as the Policy clearly states, people will want to park their cars, in line of sight, near their homes. Unless a developer can show robust and believable evidence to the contrary; which will need to be robustly tested by Planning, and to the satisfaction of interested parties; from our experience in our neighbourhood, where existing use shows there is no capacity at peak residential use times, he will need to provide parking spaces at the rate of just under or about 2 vehicles per dwelling.

4.2.8. Paragraph 4.13 states: Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes.

WA Note: It would be interesting to have some scenario laid out which fleshed this out as a concept.

We go back to the principle that it is the Developer who is deciding to develop. It is therefore the developer who should carry the responsibility and cost for making his own provision for parking spaces, sufficient to meet the parking needs of those he wishes to attract to buy the dwellings he is developing.

If he doesn't then the only conclusion is that 'the public' ie the residents 'next door' who are not benefiting from the development, and do not own a property on the development are nevertheless being expected to accommodate the parking arising from the development, in front of their existing homes. In many cases this will not be sustainable because of the density of existing need and residential parking; this is a breach of this policy.

Maximum parking standards should not be applied so rigidly that they become minimum standards.

WA Note: We don't understand, if they were applied a little bit rigidly, would that do?! The concept of Maximum standards is unmeasurable and 'you cannot measure that which you cannot count'...i.e. when the demand is treated as if it is unquantifiable...unless filtered through the redundant hapless planning algorithm, then the answer will always be what Planning and the Developer want it to be...or have decide it should be...but it will still be biased and wrong.

Maximum standards should allow developers the discretion to reduce parking levels.

WA Note: Allow discretion? Definitely not. This is a wrong-headed 'coach and horses' clause, because it allows developers to ride roughshod through social sustainability, and in so doing, to provide no parking spaces despite the certainty that purchasers of the dwellings they develop, will bring cars and want to park them.

Parking Standards should allow developers to propose the number of parking spaces they wish to provide, i.e. that they will physically provide within their development, this must be the parking level which they think will realistically meet the demand arising from the development they are proposing, be it new build or re-purposing old buildings – and this must be fairly and robustly tested to the satisfaction of those affected by the development e.g. including those living nearby. For some small private householder type developments, where there is sufficient slack in a particular location, we understand this may be desirable and potentially allowable – but for any larger undertaking, say two dwellings or more the proof of parking demand should be required of the developer. (The current model for sponsored by the developer, car parking surveys is not fit for purpose)

We calculated that the increase in parking space created during the increased kerbside parking provision and pedestrian safety work in the High Street and Broad Street area cost above £20,000 per parking space.

We recommend that where a developer wishes to suggest fewer parking spaces are required, that the calculated need without reduction be applied, and that they pay into a holding fund at the rate of 50% of the above or £10,000 per parking space they do not want to provide...with an accurate review over a two year period after the last dwelling is sold and occupied, and that the parking spaces it is shown were not needed, attract a refund of a proportion of the total.

For instance, in the case of the URC this would have been a holding sum of £700,000 because he proposed to provide no parking spaces whatsoever; a stark contrast to the s160 payment levied by the Planning Department of under £16,000. The created fund hypothecated could have helped build a parking deck on the Railway car-park for instance, doubling parking capacity for this site.

However, a particular concern with reduced on-site parking is the potential for problems associated with 'over-spill' parking.

WA Note:...'a particular concern'...puts it far too mildly. In the URC case, based on our evidence accepted at Planning Committee, about 40 spaces were required for residential parking and visitors – the intended residents were held to be work-live, therefore would be there 'all the time' or at least for large tracts of the day; when you combine this with the intention to have 100 plus staff in the offices for the solicitor's business, which will produce the need to park between 20 to 30 vehicles, probably more...conservatively between 60-70 vehicles in all...with NO parking whatsoever. This is not 'over-spill' it is massive over-kill. However, the current culture and patterns of behaviour in the Vale Planning Department saw this particular and real concern expressed by the local residents, as invisible and having no merit.

As much as anything else in this paper, this alone demonstrates the staggering inadequacies of the current Planning system and process, as we see presently being practiced in the Vale, from experience.

Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the impact of new development.

WA Note: Hear, Hear! Note LA when developing strategy. We did the hard yards and provided the evidence...but found no engagement in assessment, no answers to what we judged is the reality on the ground, no proper dialogue, no demonstration of why our objective research was flawed etc.,

etc., etc. It is no good saying one thing and doing another. Understandably, our trust in the fairness of the system fairly flew out the window.

Where on street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of on-street parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.

WA note: We hark back to our example of the URC proposal because it speaks to this point eloquently.

And on Bonfire night, regarding the road outside the URC, - page 11 of the Vale of Glamorgan Cabinet minutes 5th November 2018 says:

"The area in general was very heavily parked, a situation which was likely to worsen when the existing church building located on the south-western corner of the junction was converted into 22 residential homes of 1, 2, 3 and 4 bed residences and office premises for up to 160 office workers, with no off road parking facilities"

WA Note: As we say in our accompanying letter to Rob Thomas:

How can it all of a sudden worsen now...but despite what we told you, the free objective evidence we provided you with, you couldn't see it would worsen, then?

Since your refusal of the application for the Nursery at 28 Windsor Road, how did it get sufficiently better for Planning to recommend approval of the URC, a refusal by the way which you based on:

'...commercial use in a primarily residential area where the significant traffic generation, vehicle movements and on-street parking would have an unacceptable impact on the amenity and character of the residential area and would be detrimental to highway safety' All things which apply even more so to the URC corner.

– and of course the truth is it didn't get better, it has inexorably got worse – as our research based evidence and your own minute shows.

WA Note: We add, how come this is the official picture now, which is exactly what we've been saying for three years...yet it is very different to the very

strange so called parking surveys, used as evidence to support the 'what problem?' stance of the Developer/Planning? It would be a good start in improving our communications and relationship with the Council for this to be explained to us.

Additionally In the minutes, also referring to the same area:

...comments regarding making junction "safer" cannot be implemented due to cost:

"11.In addition the Council is currently considering a scheme proposal for a reconfiguration of the junction with associated crossing facilities which will reduce vehicle approach speeds and improve the operation of the junction.

Unfortunately the necessary funding for implementation of this scheme is currently not available."

(extract from Cabinet paper 05/11/2018)

WA Note: But according to the paragraph from the draft policy near the top of page 38, the developer should have been made to make the funding available.

The question is: Why wasn't the developer made to pay as part of his s106 payment, towards something which will massively worsen in our neighbourhood, i.e. as a direct result of the impact arising from their development?

WA Note: It was clear to Highways, to South Wales Police, to Local Business Leaders, to Romilly School Governors, to local Ward Councillors, to the Assembly Member, to over 300 households in the WRAP Around area that despite:

- No more parking spaces are created in a finite street-scape by introducing 'controlled parking'
- The evidence of saturation in parking demand
- The previous refusal of a proposal for a Nursery at 28 Windsor Road which actually quoted '**unacceptable road safety and congestion issues, and lack of parking**' (Highways)

- The unanimous concerns of the Planning Committee, despite the irrational and illogical recommendation to accept from Planning officers

That the system and procedures 'allowed' planning officers to recommend approval...they have never explained why.

WA Note: This clause alone and the way in which those with responsibilities for carrying out the process part of the Planning system, is evidence of a process and a set of behaviours which cannot be defended, are unsustainable and need serious revision.

WA Note: More than this, when experience deviates from the intended path so dramatically, it is difficult to conclude other than there is a toxic 'against the intent of the policy' agenda in play.

4.2.9. Paragraph 4.15 of the TAN in relation to residential car parking states some car free housing development may be appropriate in locations with good walking, cycling and public transport links and in areas where parking is controlled.

Onsite cycle and parking provision for those with disabilities will be required if such on-street parking cannot be provided.

Planning obligations will have a role to play in ensuring residents do not own cars in such developments.

WA note: We would like to have it explained to us why the URC, where no parking is being provided, and which therefore has all the hallmarks of the type of development covered by this clause i.e.:

1. On-street parking cannot be provided in anywhere near the number of parking spaces that the development will demand.
2. Other than in an area of Windsor Road, on street parking is not controlled
3. No plans have been put in place for parking for those with disabilities.

Yet the paragraph goes on to say that 'Planning obligations will have a role to play in ensuring residents do not own cars...?'

WA Note: Noting that the developer said 'I cannot stop them having cars'...in the light of the similarities of the URC position to 4.2.9 and the un-deliverable nature of the parking demand from the development, we would welcome Planning and the Developer deciding to make this a condition for both residential and business use

In such cases, it is essential that, prior to occupation, the future residents should be made aware of the car free status of the development and the use of travel planning initiatives should be encouraged.

4.2.10. Paragraph 4.16 states: Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.

WA note: ...*should give greater weight*...? What does this mean in practice? In a decision making tree, when coupled with 4.2.8 para 4.3: Our reading of this clause should have 'forced' the planning officers to recommend refusal – why did it not? No transparency is equivalent to secrecy, but secret for what reason – we genuinely would like to know. **This is a crucial point. If the system is to be transparent as it is claimed it wishes to be, it needs to be wholesome and trusted, fair-minded and open.**

4.2.11. Paragraph 5.13 states: The location of both on- and off-street car parking spaces will be critical to the design quality of streets.

Where on-street car parking is not controlled planning authorities should recognise that residents will seek to park as close to their homes as possible and should ensure the street layout mitigates against inappropriate parking and avoids the obstruction of pedestrians or emergency access.

WA Note: We do not understand this one. Surely in a densely populated residential area – with or without 'controlled' parking...residents will always seek to park as close to their homes as possible. Other parts of this policy

indicate that this is desirable as their mobile property (their car) should be visible from their fixed property (their home)? Strategy should enable what has been declared as desirable. It follows that policy and enactment of it through process and decision making, should enable people to park as near to their home as possible.

The following key principles need to be followed when considering the design and location of car parking:

- *The important role of the street in creating a liveable neighbourhood;*

WA note: Ain't that the truth...how strongly has this been adhered to, in allowing the URC to blight our neighbourhood?

- *There is no single best solution; a combination of onplot, off-plot and on-street will often be appropriate;*

WA Note: We agree - where there is sufficient capacity, a mix is fine, where there is not, the onus must be on the developer to provide parking either on-site or in a dedicated facility nearby, to avoid the detriment to existing residents...or alter the plans, or do not develop.

- *The street can provide a very good car park. On-street parking is efficient, understandable and can increase vitality and reduce speeds;*
- *Parking in the back of a block is recommended only after the provision of parking at the front and on street has been fully considered. Rear courtyards need to support on-street parking, not replace it; and*
- *Car parking needs to be designed with security in mind. Advice on this issue is contained in 'Safer Places'.*

Manual for Streets (MfS) (2007) recognises that parking is a key function of many streets, although it is not always a requirement.

WA Note: It is in most streets in Barry.

A well-designed arrangement of on-street parking provides convenient access to frontages and can add to the vitality of a street.

Conversely, poorly designed parking can create safety problems and reduce the visual quality of a street. Chapter 8 considers the parking requirements associated with new development

and advises that while the greatest demand is for parking cars, there is also a need to consider the parking of cycles, motorcycles and in some instances service vehicles.

WA Note: - and there you have it. After all the understandable better quality of life advice about cycling, using buses and trains, walking etc – it comes down to an acknowledgement that **...the greatest demand is for parking cars.**

4.2.13. It provides advice on safety and security of car parking: cars are less prone to damage or theft if parked in-curtilage.

If cars cannot be parked in-curtilage, they should ideally be parked on the street in view of the home.

WA Note: We would probably, had we read this much earlier, have put this at the core of the case regarding social sustainability – why would any policy, interpretation of policy or decision in planning, want to do anything other than seek to work to such an ideal? This naturally leads to not only a notional allocation but also one at an ‘in sight’ location...near the home-owner.

Following this through logically, people having cars, wanting to park near their homes, wanting this to be in line of sight from their front window – establishes the case we have been putting forward all along; these factors establish the principle of notional allocation. if there is no space at high use residential times...there is no space to notionally allocate to new proposals. You cannot allocate a space more than once...this natural progression and obvious outcome does not feature in the dodgy algorithm.

Where parking courts are used, they should be small and have natural surveillance.

4.2.14. Paragraph 8.3.5 states: Local planning authorities will need to consider carefully what is an appropriate level of car parking provision.

WA Note: Ah yes, **appropriate...to meet the realistic needs**, or perhaps a different appropriation of appropriate? We have proved that the algorithm does not produce the answer to ‘**how many parking spaces will this development need in practice?**’

In particular, under-provision may be unattractive to some potential occupiers and could, over time, result in the conversion of front gardens to parking areas (see box).

WA Note You'd have a hell of a job converting WRAP Around area front gardens into parking areas...and if you did, there goes another section of kerbside for on-street parking; but with regard to under-provision...this already exists, the job has already been done by successive Planning decisions,...before the URC proposal was a speck in anyone's eye.

This can cause significant loss of visual quality and increase rainwater run-off, which works against the need to combat climate change.

WA Note: Agreed.

Policy MD2 - Design of New Development - sets out the key principles that should be considered in respect of design, amenity and access. It requires development proposals to provide safe and accessible environments for all users, giving priority to pedestrians, cyclists and public transport users and provide car parking in accordance with the Council's standards. This SPG sets out those standards.

WA Note: Again – amenity, parking spaces for existing residents is identified as one of these, key word in this policy is 'provide' which is the opposite of 'not provide'.

Policy MD4 - Community Infrastructure and Planning Obligations - seeks to secure new and improved community facilities and services appropriate to the scale, type and location of proposed new developments including transport infrastructure and services for pedestrians, cyclists, public transport and vehicular traffic.

Policy MD5 – Development Within Settlement Boundaries – sets criteria for these developments, stating that proposals will be permitted where (amongst other things) they have no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking.

WA Note: It would be better to be clear and avoid doubt: '....they will not be permitted where they have an unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking.' The URC proposal should not have been permitted if it had been objectively tested against this policy.

Key here is how this is assessed and how will we know it. We have here a fundamental transparency and trust issue. The challenge is also, if the Planning Officers have got it wrong, but still recommend approval – where is the safety mechanism step in the process, and who at a higher level within the Council is doing the overview and scrutiny **before** this becomes set in stone.

Against this criteria alone, a decent decision making tree, able to be viewed in the public domain, would never have allowed the URC

4.3.3. It should be noted that the policies detailed above comprise the primary policies of the Vale of Glamorgan LDP relating to sustainable transport, parking and movements however other policies of the plan may also have a bearing on such matters and be utilised in the Council's determination of future planning applications.

4.3.4. The Local Transport Plan 2015 – 2030 (LTP) - The LTP sets the transport agenda for the Vale of Glamorgan, by identifying the sustainable transport measures required for the period 2015 to 2020 as well as looking forward to 2030.

The LTP seeks ways to secure better conditions for pedestrians, cyclists and public transport users and to encourage a change in travel choices away from the single occupancy car.

WA Note: No problem with encouraging choices away from single occupancy car, as long as it is choices NOT coercion

The LTP also seeks to tackle traffic congestion by Parking Standards SPG – Draft for Consultation (December 2018) securing improvements to the strategic highway corridors for commuters who may need to travel by car as well as providing better infrastructure for freight. It also addresses the key road safety priorities for the Vale.

4.3.5. National and local policy has therefore seen a fundamental departure from predicting and providing for private cars and a move towards managing traffic and reducing the dependency on the private vehicles.

WA Note: We have no argument regarding what national policy wants to set as the direction of travel, we anticipate that reducing dependency on private vehicles is fine, as long as the reduction is a result of the choices people freely make. If people are able to do all they wish to do by using more attractive &

improved 'other modes' of transport – fine, but it is clear there is much to do to ensure this is in place...and even then it has to be their free choice.

Nationally, bus journeys are falling, train-fare costs are escalating, and outside major conurbations – many journeys simply cannot be undertaken on public transport. Cardiff bus is cutting services and there are no additional services or increase in carriage sizes or numbers of carriages making up the trains, despite the model shift argument deployed by Planning.

And although these trends are travelling in the wrong direction currently, even if these improvements happen, sometime in the future, this local policy accepts that individuals wish to have the freedom to have a private vehicle and to park it near their home.

Unless people sign up to not having cars...when they move in, they will bring cars, as the URC developer said 'I cannot stop them having cars'.

Supplementary Planning Guidance

4.4.1. Planning Obligations SPG – The Planning Obligations SPG, provides clarification of where, what, when and how planning obligations will be sought, in order to assist the Council in creating sustainable communities that provide social, economic, and environmental benefits. This guidance offers advice on planning obligations in support of the policies in the Vale of Glamorgan LDP, including planning obligation requirements for sustainable transport facilities that will assist in delivering successful Travel Plans that can influence parking demand.

WA Note: 'Travel Plans' only possibly influence parking demand where people are travelling to...the places served by the travel plans. One of our working group members had 19 jobs in their career, the last 14 of which required him to be independently mobile and have his own car. For the whole of the period covered by the 19 jobs...he had a car.

4.4.2. Travel Plan SPG – This SPG sets out the Council’s requirements for Travel Plans in order to reduce the reliance on the private car and encourage a move to more sustainable modes of transport.

WA Note: See above

4.4.3. Residential and Householder Development SPG – This SPG provides advice on what matters must be considered when designing new residential development or improvements or alterations to your home, preparing plans and submitting planning applications. The SPG provides guidance on the main issues arising from new householder development; provides a number of standards that should be complied with in order to safeguard residential amenity; sets out a series of principles to be followed to ensure good design; and provides possible solutions to certain design issues encountered.

Application of Parking Standards for the Vale of Glamorgan

5.1. In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as maximum rather than minimum standards i.e. they are ‘not more than’ figures.

Car parking provision is a major influence on the choice of means of transport and the pattern of development. We need to ensure that new developments provide lower levels of parking than have generally been achieved in the past and minimum parking standards are no longer appropriate (PPW paragraph 8.4.2 refers).

WA Note: See our notes earlier on the Max-Min Park-o-meter confusion.

5.2. It is considered that using maximum standards which limit the amount of parking provided on developments can help focus attention on the overall travel context of a development including the availability of more sustainable modes of transport such as public transport, walking or cycling. Such an approach will enable more flexibility to the application of the parking standards (where supported by appropriate and robust evidence) to reflect local conditions and the availability of alternative forms of transport and may result in a reduction in the level of vehicle parking required.

WA Note: This is fundamental. The key words in this paragraph are:

Help focus attention,...enable more flexibility in the application of parking standards (where supported by appropriate and robust evidence)...to reflect the local conditions and ... may result in a reduction of the level of parking required.

The reason they are key is emphasised by the last word ‘required’.

The meaning of required in this context is:

- the number of parking spaces required and necessary to enable the development to work and in almost all cases, consume its own parking needs smoke.
- required in terms of being sufficient for the needs of the new and incoming residents,
- required in order to preserve and protect the amenities currently enjoyed by adjacent or nearby residents
- required in the context of the competing pressures for parking
- required because of the successive planning allowed hereto with insufficient (not none) parking and this having already taken up any slack
- required because the developer can demonstrate the demand will be for fewer parking spaces than may have been envisaged in the past: and crucially can prove this to be the case, and is held to that proof in practice...and pays for it if he is wrong
- required to be appropriate and robust evidence...because dodgy parking surveys do not demonstrate residential need, temporally unused allocation etc and in the case of URC where they fantasised about 24 parking spaces which were just not there! The current method of viewing the poacher as also the gamekeeper, i.e. the developer arranges the surveys, we have proved is **fundamentally broken and bad governance**

5.3 In assessing the parking requirements for a particular development, the Council will take into account a number of factors in relation to the development and its location. These could include:

- ***Accessibility to and the service provided by public transport;***
- ***The availability of private buses, taxi services or the extent of car-pooling;***
- ***The relative proportions of full time / part time / local catchment of labour;***
- ***Accessibility by walking and cycling to every day goods and services;***

- *The existing and possible future parking provision, traffic volumes and congestion on streets adjacent to the development;*
- *Potential impacts on highway / public safety;*
- *Accessibility to and the availability of public and/or private car parking spaces in the vicinity.*

WA Note: The first four cannot be used as material to having a bearing on the actual demand for parking spaces that will in practice arise from any given development, unless there is robust evidence to show they actually will and have had a bearing. We asked to see a similar set of data from Planning in a FOI request, in order to tease out norms, impact from decisions etc., in other words the learning from experience; they refused to provide it.

Question: What evaluation of developments are done post decision to approve, to test if the assumptions made at the time of recommending approval were close, far off or horrendously incorrect? Please tell us where is the Learning? From here, and from experience, we see no appetite for it.

5.4. The parking standards cover all areas in the Vale of Glamorgan but apply to designated zones (as set out in Section 6 below). Whilst they should not be applied as minimum standards (following the advice in PPW) they suggest the starting point for considering the necessary level of parking to serve new developments. If satisfied these developments are unlikely to cause highway safety problems associated with inconsiderate parking or contribute towards issues such as congestion.

Where they are not met, consideration will need to be given to whether it is justified in light of other considerations (see paragraph 5.3 above) and whether there are likely to be problems associated with a lack of designated parking spaces in the vicinity of the development for existing communities and the future users of the development.

Where these problems Parking Standards SPG – Draft for Consultation (December 2018) would occur from a lack of adequate parking, planning permission may be refused as the development would be contrary to LDP Policy MD2.

WA Note: Well, from our experience with the URC, it was very clear there will be problems associated with 22 dwellings and offices accommodating over 100 people while providing no parking whatsoever, therefore 5.4 is a useless

piece of fluffy nonsense. *If satisfied unlikely...what, really?! Who satisfied, why unlikely, how judged, what evidence...in application to date, this is just silly waffle mumbling and bonkers.*

5.5. Whilst there is a desire to reduce the reliance upon the private car, it is anticipated that, in most cases, there will be a need to accommodate parking provision for cars within residential developments.

WA Note: **Within**...so where was this clause and why did it not feature, when URC was being decided?

There is the potential for a reduction in residential parking levels particularly if the property is in close proximity to local community facilities, public car parks, is well served by public transport and/or there is evidence of low car ownership.

WA Note: We provided evidence of car ownership, which was over twice the algorithm derived nonsense.

Care should be taken however to avoid reductions that will potentially create highway safety issues and consideration must be given to local circumstances e.g. road widths, local on-street parking demand, proximity to turning heads or bus stops etc. These matters need to be considered on a case by case basis.

WA Note: Considered by whom, in which way with what evidence, what weighing up protocol, how reviewed, how shared how understood and how accepted??? We need to know, in order to inform suggested improvements in the written step by step process for doing this - and it therefore needs to be publically available.

There may be some instances where reduced or zero parking is acceptable, for instance, where developments are in highly accessible locations served by a range of public transport options and/or it can be demonstrated that there is low parking demand.

WA Note: Residents need proof that a low parking **actual demand** has been demonstrated. (Not the discredited algorithm)

However, these proposals would need to be supported by robust evidence which fully justifies why a reduced or zero level of provision would be acceptable. Such evidence could

include but is not restricted to local parking surveys, comparative assessments with existing / previous uses, likely car ownership evidence for future occupiers, travel plan strategies etc.

5.7. Where a car parking survey is required it should establish the existing parking demand within the local area of a proposed development using on-site assessments / observations. In order to obtain a true reflection of the existing local car parking arrangements, site surveys should be undertaken over a period of at least one week including both weekends and weekdays at a variety of times throughout the day relevant to the nature of the use proposed including peak times, late in the evening and early in the morning. Times where unusually high or low parking demand is being experienced which is outside the norm (e.g. School holidays, bank holidays or special events) should be avoided.

5.8. It will often be relevant to take into account the existing or previous use (or uses that could result from a 'permitted' change of use) and the parking requirements associated with it, together with an analysis of the actual provision for that use.

WA Note: It is not relevant when existing or previous use is compared to actual provision for that use, this is particularly so when Planning decisions in the intervening period have eliminated 'the actual provision' for that use.

This is why taking notice of fall-back was inappropriate and unfair in the case of the URC, because it was applied as if the capacity on the roads was still the same – when the Council and the Developer knew it not to be so. We refer you again to the Cabinet minute on the 5th Nov 2018 which independently demonstrates that the Council knows this not to be so.

This is why we have always challenged the idea of previous use or fall-back.

*If the parking serving the existing use is already lower than the parking standards, this can be a material consideration justifying a reduced level of parking **where there is no additional detriment compared to the existing situation.***

WA Note: If the change in use significantly increases the use over the previous use, then there is additional detriment compared to the existing situation. Fall-back or previous use should be held not to apply.

Any developer working collaboratively with local residents can identify current actual use of parking for the existing or previous use. We did this and were

happy to share our evidence with both Planning and the Developer and we did so – Planning did not encourage a change of heart and the Developer was unwilling to respond to our evidence and offer a compromise. We felt this was a fair test of the good neighbour intentions of a developer...and the existing residents.

There is a fundamental aspect in judging what people (developers) say they want to do. They are responsible for choosing to do what they want to submit as a proposal. If they wish to massively increase the parking needs because of their chosen change of use, it is for them to provide the on-site parking to go with their proposal, where the existing residential roads have been shown to be saturated – otherwise, don't develop...it is really as simple as that.

5.9. New residential layout design, as advocated by Manual for Streets, can create areas of unallocated parking which can supplement those areas of allocated off-street provision i.e. driveways, garages.

WA Note: True it can. Unfortunately, in already built up densely populated residential neighbourhoods there are limited and dwindling amounts of 'unallocated' provision.

We question the idea of unallocated. As a description to cover kerbside which is not a driveway, garage etc it is fine.

But, let us imagine a scenario where there are 10 dwellings with 102 metres for their frontages and with no off road parking available to them. In Rip-car-Winkle close they own cars at the rate of our community average of 1.7 vehicles each. (1.7carsx6mx10dwellings=102 metres)

Policy acknowledges they will want to park as close to their home as possible

Policy says it is desirable for their vehicle to be in line of sight from their home...therefore policy accepts that the available parking in this residential road is all taken up.

The oft used 'you have no legal right to expect to park outside your home' i.e on the public road...is understood - and all these neighbours are flexible.

Jane returning from shopping, parks outside Anthea's home and is helped by Jim to unload her shopping, Jack takes his two children three doors down to strap them in their baby seats. Each of them can see their parked vehicle from their front room. None of them asked for or expected a legal right to park outside their own home, but all of them are good neighbours and are pleased policy acknowledges they will wish to park near their homes where policy also advises it is good if they can see their cars from their front windows; and it all works just fine. Everyone tries to avoid parking outside Mrs Jones's house- she is one of the oldest and longest standing residents. She is 98 and cannot walk far and her daughter, quite elderly herself, still arrives daily to take her out.

People are coming back from work and the road is filling up. The last one home is Jo, back at 9.00pm from her 12 hour shift in the operating theatre in the general hospital; 20 miles away...she parks in the last space available.

Policy and life are as one, the spaces are appropriately 'notionally' allocated for use of the residents living in this road. This is a good close knit and supportive community, and from a parking amenity perspective a socially sustainable neighbourhood.

The next day in Rip-car-Winkle close, they all wake up at different times. - *But unbeknown to them, it isn't the next day; it is 3 years later...*

They look out of their windows and can see a shadow falling over their still visible cars. They wonder if it is a Mosque, a strange call floats over their close...'we'- *meaning you, all have to compromise...*it seems to say.

To the just waking from a long sleep Rip-car-Winkle folk, apparently overnight, 22 dwellings and offices holding well over 100 people have landed on the corner of their street...with no parking provision.

'Where did that come from – and why would anyone, do that or allow it to happen in this neighbourhood?' they all asked.

Our friends in RcW Close never got an answer...nor did we...but we demand one, now.

A parking requirement for a particular property can count both off-street allocated space and unallocated on-street space provided there is a realistic chance the latter will be used and its use will not create obstruction or congestion for other road users.

WA Note: We agree with this, sadly URC did not fall into this description, or anywhere near.

For the purpose of this document, a standard parking space is considered to be 2.6 m x 4.8 m however, sufficient space must be available around this area to enable safe and...

WA note: i.e. 6m when looking at kerbside provision

We confirm we are working on our other recommendations which will follow in the next 7 days.

Thank you for inviting us to respond to the draft Planning Policy. We look forward to meeting you in person, to discuss the contents of our submission in detail.

Best wishes

The WRAP Around Residents' Action Group.

On behalf of the WRAP Around community.

Version 4.3 as prepared and submitted.

