Llancarfan Community Council

Comments on the Newydd Housing Association consultation documents, proposed development Land South of Llancarfan School, Llancarfan

Reference	Planning, Design and Access Statement	Comment
2 The Site & Surroundings		
Page 7, Site	There are no listed building within the site, however two listed buildings and a Scheduled Ancient Monument are found within the village to the west. The proposed development site lies within a Special Landscape Area and adjoins the Llancarfan Conservation Area. In terms of other statutory/non-statutory designations, the site lies within Flood Zone A on the TAN 15 development advice map.	The proposed development lies within the Llancarfan Conservation Area. It is a requirement of both national and local planning policy that development proposals must preserve the character or appearance of the area. This proposal does neither.
Page 7, Surroundings	As stated, the site is located directly adjacent to the settlement boundary of Llancarfan, which is a sustainable settlement served by a number of local facilities, including a community hall, place of worship and public house. Additionally, the site is highly accessible via the existing highway network, both within the village itself and to regional destinations. The A48 lies approximately 3.5km to the north which provides links to Cowbridge and Culverhouse Cross/Cardiff, whilst the B4265 is located approximately 2.3 km to the south, providing links to Barry and Cardiff Airport.	The proposed development lies outside the Village Boundary as determined by the Local Development Plan, June 2017. The only facilities in the village are those mentioned. There are no others. The roads into the village are narrow, twisty and poorly maintained. Road flooding from water run-off is a problem in wet weather, this restricts access to the village. In fact one of the reasons for closing the school was given as "An additional challenge relates to the difficult and congested

		access to the school through the village and the lanes leading to Llancarfan" and the new school would address a number of challenges, one being "Poor access to the school through the village and lanes would be addressed".
Page 8, Surroundings	A mixture of land uses are found in the surrounding area, including a community hall, public house and church. Residential land uses are the predominant land use within the village. A wide variety of house types are found in the locality, including bungalows, detached, semi detached and terraced properties. This is considered in greater detail in the following section. Car parking in the surrounding area is predominantly off street, with driveways and small parking courtyards in the case of residential properties found within the village.	There are no terraced properties within the village.
Page 9, Frontage/enclosure	Frontage/enclosure: The majority of properties are set back from the road, with boundary walls and landscaping features providing privacy from the adjoining highway. The exception to this observation is in the mainly historic areas of the village to the south of St. Cadoc's Church, where an assortment of 19th century cottages directly adjoin the highway, end-on to the road, a typical Glamorgan arrangement.	The older houses in the core of the village are from the 16th century
Page 9, Flood risk & drainage	On the latest Development Advice Map published by the Welsh Government to accompany TAN 15: Development and Flood Risk, the site is shown to lie in flood risk zone A, which is defined as land 'considered to be at little or no risk of fluvial or tidal/coastal flooding'. The pre application response received from the LPA confirms that "there are not likely to be concerns in respect of the proposed development resulting in issues of flooding."	The river floods the roads by the ford, the pub car park, burial ground and the adjacent houses. For the remainder of the village water run-off from the fields in times of heavy rain presents problems and leads to flooding in the road in front of the village hall and elsewhere. Insurance companies consider the whole area is at flood risk and premiums for both building and contents cover are high.

Page 9, Ground	The Ground Investigation Report produced by Ian Farmer Associates indicates the site to	Springs are present in the area of the proposed
conditions	be underlain by Lavernock Shale Member of the Lower Lias which consists of mudstone. On the basis of observations made on site together with results of in-situ and laboratory tests, together with empirical correlations, consideration could be given to the adoption of lightly reinforced strip or trench fill foundations to support the proposed structures. Some 'cut and fill' of the site will be required accommodate the development.	development and the ground becomes very wet during periods of heavy rain. Drawing A011 indicates a substantial cut to fill with the southern boundary being raised by 3m or more. No effort has been made to design the development to suit the existing contours. This will make the houses on the southern side of the proposed development highly visible and is not in keeping with other dwellings in the village. This will be visually intrusive. There is concern that the change in the land profile will affect the ground water paths and lead to drainage issues for the Llancarfan Tennis Club whose court will lie beneath the new retaining wall.
Page 10, Ecology	The development may result in impacts on wildlife habitats affecting the following protected habitats and species: hedgerow, bats, common dormouse, reptiles, nesting birds and hedgehogs;	The Preliminary Ecological Appraisal states that the development is "likely to have a negative impact on reptiles and nesting birds and may have a negative impact on bats, hedgehogs and common dormice".
Page 10, Ecology	A precautionary approach to the removal of the onsite hedgerow with consideration for common dormouse will be employed. This habitat will be reinstated following the works;	Both the Preliminary Ecological Appraisal and the Ecological Impact Assessment state that the hedge is to be replaced. The drawings show that no effort has been made to reinstate this habitat. The Preliminary Ecological Appraisal states "The hedgerow is earmarked for removal. The proposed development would therefore have a major impact on this habitat".

3 Policy Context		
Page 14, Transport	PPW sets out that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which for example "are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car" (Paragraph 4.1.9).	The location for this development patently does not comply with this Paragraph in the PPW The only means of transport in this location is by car. There is no public transport.
Page 14, Transport	PPW outlines the requirement to utilise a 'sustainable transport hierarchy' in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.12 sets out that "The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport".	Anyone living in the village is car dependent. The proposed development does not comply with this paragraph.
Page 15, Technical Advice Notes	TAN 18 (Transport) advises the location of new residential development has a significant influence on travel patterns as the majority of trips start or finish at home. Residential development should be at locations with good access to jobs, shops and services by modes other than the car, and developers should be able to demonstrate: • the development will facilitate access by new residents to public transport stops, local shops and facilities by walking and cycling; • walking and cycling routes to public transport stops, local shops and facilities; • public transport routes through the site are direct are provided; and • walking, cycling, public transport and car routes through or adjacent to the site are	The Development does not comply with this Technical Advice Note in any regard.
	well integrated.	

Page 16, Technical Advice Notes	In respect of the location of development, Paragraph 6.2 advises that "local authorities should promote walking as the main mode of transport for shorter trips through the use of their planning and transport powers". It continues to note; "in determining planning applications authorities should ensure that new development encourages walking as a prime means for local journeys by giving careful consideration to location, access arrangements and design, including the siting of buildings close to the main footway, public transport stops and pedestrian desire lines".	This Development is contrary to this paragraph. Other than local walking around the village as a form of relaxation, it is too far to walk to any public transport stops or locations for work.
Page 16, Vale of Glamorgan Local Development Plan	have no unacceptable impact on highway safety nor cause or exacerbate existing traffic congestion to an unacceptable degree.	This development will greatly increase the volume of car traffic in the village. This is of particular concern for school children waiting to catch the school buses that pick-up adjacent to the river bridge at the bottom of school hill.
4 Material		
Considerations		
Page 19, Principle of Development	A scheme that comprises 100% affordable housing is proposed and should therefore be assessed under Policy MD10 (Affordable Housing Developments Outside Settlement Boundaries), which sets out the criteria for affordable housing exception sites in the countryside. Policy MD10 states that 'small scale affordable housing development will be permitted outside settlement boundaries where they have a distinct physical or visual relationship with and existing settlement.' The proposed development site directly adjoins the village of Llancarfan to the north and west, and it is considered that the site has a distinct physical relationship with the established village.	The proposed development does not have a distinct physical relationship with the established village. It is a stand-alone development.
Page 19, Principle of Development	Policy MD10 allows for "small-scale" affordable housing development outside settlement limits where it has a "distinct physical or visual relationship with an existing settlement". In regard to the definition of 'small-scale', the LDP outlines that in or adjoining some of the larger settlements, proposals for more than 10 dwellings may be acceptable if required to meet	The Local Development Plan, June 2017, in its Settlement Hierarchy list Llancarfan as a Minor Rural Settlement and it is not a "larger settlement". The 13 dwellings proposed does not comply with Policy MD10 which clearly states

that any proposed development be small scale specific need and where the number of dwellings is proportionate to the size of the settlement with 10 or less dwellings. 13 dwellings in this and satisfies all the other criteria against which a housing development would be judged. location is not proportionate to the size of the It is considered that the development of 13 units adjacent to the settlement boundary of existing village and has no distinct physical or Llancarfan is proportionate to the size of the settlement, with Llancarfan being a sustainable visual relationship with the existing village offering existing local facilities. In addition, the site has a clear 'physical relationship' settlement. with the exiting settlement, being located directly adjacent to the south-eastern extent of the The majority of the identified need will come settlement boundary. from the much larger settlement of Rhoose. Llancarfan is a minor rural settlement with extremely limited facilities and no transport links. In relation to a proposed development of this nature, existing facilities will mean shops, takeaways, places of work etc. not a church, a village hall and a public house. There are no other facilities in the village. The proposed development does not comply with Policies MD1, MD2 and MD8 as laid out in the Local Development Plan particularly regarding the Conservation Area status, responding to the local context and public transport users. Page 19, Principle There is no established need for a development Policy MD10 sets out the following five criteria which will allow for small scale affordable of Development of this size within the area local to the housing proposals to be permitted outside of settlement boundaries: village, particularly as this development is rental '1. The proposal meets an identified local need which cannot be satisfied within only. identified settlement boundaries.' A development of 13 dwellings is not considered Response: A clear and pressing need for affordable housing provision has been established small-scale in nature. within the local area – the 2015 LHMA determined that 559 additional affordable housing units The access statement already states correctly were required each year to meet housing need in the Vale of Glamorgan, and the Homes4U that the primary school is closing and a church waiting list, shows there is considerable current need in the Rhoose ward (within which cannot be considered a facilty as meant in this Llancarfan is located), with 152 households currently in need of an affordable home. However, context. there no suitable infill sites located within identified settlement boundaries of Llancarfan itself There is no opportunity within the existing to accommodate the proposed development. settlement to improve the infrastructure.

	'2. 'The number of dwellings is in proportion to the size of the settlement.' Response: The proposed development is small-scale in nature, consisting of a total of 13 units. It is considered that a scheme of this size is in proportion to the settlement of Llancarfan — which as a rural settlement offers a number of local services (primary school, church, public house). The Vale of Glamorgan LDP defines Llancarfan as a 'minor rural settlement', which has been identified as a sustainable settlement which can accommodate additional housing and associated development, in order to help spread the benefits of residential and commercial development more evenly across the Vale of Glamorgan. Additionally, the LDP states that development in these locations will not only help to sustain existing services and facilities but can also provide opportunities to improve infrastructure. By limiting the proposal to 13 units as well as positioning the units on land most closely related to the physical extent of the settlement, it is considered that appropriate integration of the dwellings with the existing settlement can be achieved.	See previous comments on the number of dwelling proposed and the lack of any physical connection to the existing settlement.
Page 20, Principle of Development	The site is located within easy walking distance of a number of existing local facilities including a community hall, sports & recreation area (tennis court), church, and public house.	The tennis court, which is the only sport and recreation facility in the village, is a private facility. The tennis court is unrestricted in terms of its use and benefits from a location where there are no neighbouring occupiers that might otherwise be disturbed. The proposal has housing in very close proximity to the court and it would not be acceptable for its operation to be constrained by the proposed development. In relation to walking there are few pavements in the village so walking is generally on the highway with the risks that carries.
Page 20, Principle of Development	It is therefore considered that the proposed development of affordable housing at land adjacent to Llancarfan Primary School fully accords with the provisions of Policy MD10, and therefore represents an appropriate and acceptable rural exception site, which will contribute to meeting the pressing need for affordable housing in the local area.	The proposal for 13 dwellings does not represent an appropriate and acceptable development and the land should not be granted as an Exception Site.

Page 20, Affordable Housing	The Homes4U waiting list information for Rhoose ward is currently: Rhoose 1 bed 66 2 bed 53 3 bed 29 4 bed 4 Total: 152 The Homes4U waiting list, which provides the most accurate and up to date picture of local need, shows there is considerable current need in the Rhoose ward, with a total of 152 additional affordable housing units required.	There is no information to show what demand there is for social housing in the reasonably remote settlement of Llancarfan. Llancarfan has no transport links and very limited facilities. A car is essential in order to get out of the village to any shops or places of work. It is difficult to see the case for affordable rental housing in Llancarfan.
Page 21, Affordable Housing	The proposed development of 13 affordable housing units at land to the south of Llancarfan Primary School will assist in meeting the need to provide affordable housing, addressing a clear identified need within the local area, in accordance with both national and local planning policy.	There is no information to show what demand there is for social housing in the reasonably remote settlement of Llancarfan. Llancarfan has no transport links and very limited facilities. A car is essential in order to get out of the village to any shops or places of work. It is difficult to see the case for affordable rental housing in Llancarfan.
Page 21, Affordable Housing	Newydd Housing Association can, as per the approach taken at the Herberts and St Athan, adopt a bespoke Local Lettings Policy which can, if necessary, be discussed with the local community and the Authority's Housing Section. This will in summary ensure that priority is given to those applicants with a local connection.	The developments at both the Herberts and St Athan cannot be compared to that proposed in Llancarfan. Both the named developments are located in areas with an established bus network. The development at the Herberts is only 8 dwellings while that at St Athan is much larger and is in easy walking distance of a number of shops, takeaways, doctor's surgery and a primary school.

Page 21, Scale of Development & Integration with Settlement	It is considered that the positioning of the proposed housing directly adjacent to the south-eastern extent of the built form of the existing settlement will ensure that the impact of the proposed development upon both its immediate setting and wider surroundings will be minimised. The proposed are not located within open countryside, they are located directly adjacent to the settlement boundary, and by virtue of the positioning of the proposed units, the proposal would form a logical extension to the existing built form at the south-eastern extent of the settlement. It is considered that the proposals will integrate effectively with the existing settlement pattern, and will therefore have no adverse impact upon the rural character and setting.	The proposed layout does not integrate with the wider settlement of Llancarfan. It is a standalone development outside the Village Boundary. It does not sit directly adjacent to the south-eastern extent of the existing settlement and does not form a logical extension to the existing build form. The proposed access and frontage to the development is not appropriate for this location and is out of keeping with the village. The design does not make use of the existing ground contours and the intention to raise the southern boundary by 3m or more is out of keeping with the village and will make the development visually intrusive. The proposals do not integrate effectively with the existing settlement pattern and will have an adverse impact upon the rural character and setting.
Page 21, Access, Highways & Parking	It is proposed that the development will be served from a new access, which will be achieved from the unnamed highway that currently runs parallel to the site's northern boundary. The Speed Survey & Access Appraisal undertaken by Acstro has provided the access requirement of the site, given its context within the wider highways network. A speed survey was undertaken in November 2018 on the unnamed public highway near the existing site access. The survey found the recorded 85th percentile speed (mph) of traffic at 19.0 travelling northbound and 18.1 travelling southbound. Using these figures, the required visibility splays from the proposed access point are: • 2.4 x 23m visibility to the south; and • 2.4 x 22m visibility to the north. As such, it has been demonstrated within the Access Appraisal that it is possible to provide the required visibility splays.	The access as shown on the drawings is totally at odds with any other part of the village and is not acceptable. A long-established hedge bank is to be removed and replace by low stone walls with flat top coping stones. This type of construction is not appropriate in this location and no effort is made to hide the development. The ecology report and the Access Statement refer to the hedgerow habitat being reinstated.

Page 22, Access, Highways & Parking	22 car parking spaces have been provided as part of the proposed development. Although this falls short of the required 24 car parking spaces, owing to the two visitor spaces required for every five homes, national guidance indicates that new developments should provide lower levels of parking than have generally been achieved in the past and minimum parking standards are no longer appropriate. It is acknowledged that the parking guidelines are a 'maximum', and where relevant a lower level of car parking is justifiable. This is particularly the case for affordable housing where low levels of car ownership are generally expected. It is therefore considered the 22 car parking spaces provided is sufficient, as it is commonly accepted that affordable residential developments generate a lower level of parking demand than open market schemes. Furthermore, the proposal will not result in an unacceptable effect on the character and amenity of the area by exacerbating parking problems or traffic congestion.	The proposed development has 13 dwellings with 22 bedrooms and is suitable for 41 persons. As there is no public transport within walking distance of the development anyone travelling to work or shops will require a car. If is it assumed that each dwelling will need 2 or more cars, then parking for 22 cars is totally inadequate. There is no available parking on street other than for those existing properties that have no off-road parking. It is also noted that some allocated spaces will be blocked in by other cars, this layout is not acceptable. The number of deswellings proposed is too high in relation to this development. If affordable housing developments generate a lower level of parking, this would suggest that the lack of public transport could be an issue for prospective tenants as car ownership is lower.
Page 22, Ecology	The mitigation methods outlined within Ecological Impact Assessment undertaken by Wildwood Ecology in June 2019 will be utilised. The surveys completed in April and May 2019 indicates the development may result in impacts on wildlife and habitats affecting reptiles and nesting birds. Recommendations include a Reptile Mitigation Strategy and timing of works to avoid impacts on nesting birds, as well as enhancement measures. Providing the recommendations outlined within the report are successfully implemented, it should be possible for the proposed development to proceed and for there to be no long-term impacts upon the key protected species present at the site.	The Ecological Impact Assessment does not recognise the importance of this area to bats and the proposed mitigation measures are inadequate. No night-time surveys for bats has been carried out nor any reference made to bat detector recording equipment being used. The local bat group has recorded the presence of Pipistrelle, Natterer's, Brown long eared, Daubenton's and Noctule bats in the centre of the village and the road alongside the school; this location is close to the proposed development site. The presence of a large maternity roost of Serotine bats has been recorded in the church.

		Bats are routinely seen to fly over the area of the proposed development which is an important foraging area. Data is available online on the National Bat Monitoring programme. It is noted that no mammal or invertebrate surveys have been carried out, this is a major omission. The layout drawings do not show the area to be enhanced for reptiles, see Ecological Impact Assessment Appendix III: Reptile Mitigation
Page 22, Trees	An Arboricultural Impact Assessment (AIA) was undertaken by ArbTS in October 2019. With regard to overall tree loss, the report indicates that one small tree (Tree D1 Hawthorn cat. C – low quality), 225m2, of tree group and one 46 metre length of road side hedgerow, all of low quality, are required to be removed to facilitate the construction of the proposed development. Tree ID G2 is a low quality group with a more limited future life expectancy as many of the tress are slender or in poor form. Crack willow species are prone to stem/branch failure. The removal of part of this tree group will have a moderate adverse impact onto the landscape directly around the site, but with suitable replanting provided, the loss can be mitigated.	As the area proposed for the development is within the Llancarfan Conservation area the felling or lopping of any tree will require permission from the Vale of Glamorgan Council.
Page 22, Drainage	The Drainage Strategy produced by Vale Consultancy indicates that the site foul flows will be managed via a new adoptable foul sewer system, which will connect to the existing DCWW network at a manhole situated east of the bridge crossing the Nant Llancarfan. The site surface water runoff will be controlled by the application of a surface water management strategy with a restricted flow of 2.0 l/sec passing forward to the Nant Llancarfan via a new linking surface water drain, with attenuated storage provided in the subbase of the shared surface access road permeable paving.	It is not clear whether the existing treatment works will accept the increased flows from an additional 13 dwellings. There have been a number of recent issues with the foul drain overflowing and flooding the gardens of the houses between the river bridge and the treatment works. When the river is in spate the elevated level of the water covers the existing drainage outfalls and stops further flows from the drainage system. This leads to flooding of the area in front

		of the village hall from water run-off from the surrounding fields. Without adequate water storage when high water levels in the river stop off the proposed outfall water may back up the system and cause the proposed manholes to overflow or surcharge the attenuated storage.
Page 23, Drainage	The proposed surface water drainage scheme will ensure no increase in runoff over the lifetime of the development. The on-site development foul and surface water drainage will remain separate, with the surface water and foul systems being offered for adoption under a Section 104 WIA91. • The settlement of Llancarfan provides local services and facilities which themselves would benefit from a larger residential catchment; The proposed development would not give rise to adverse highway or pedestrian safety concerns, or impinge the free flow of traffic in the area;	It is not clear whether the existing treatment works will accept the increased flows from an additional 13 dwellings. When the river is in spate the elevated level of the water covers the existing drainage outfalls and stops further flows from the drainage system. This leads to flooding of the area in front of the village hall from water run-off from the surrounding fields. Without adequate water storage when high water levels in the river stop off the proposed outfall water may back up the system and cause the proposed manholes to overflow or surcharge the attenuated storage.
5 Design		
Page 25, Layout	The proposed layout has been designed to integrate with the wider settlement of Llancarfan. The proposals create a positive frontage in the existing settlement which adjoins the unnamed access road to the north.	The proposed layout does not integrate with the wider settlement of Llancarfan. It is a standalone development outside the Village Boundary. The proposed access and frontage to the development are not appropriate for this location and is out of keeping with the village. The design

		does not make use of the existing ground contours and the intention to raise the southern boundary by 3m or more is out of keeping with the village and will make the development visually intrusive. The design does not address how the dwellings are to be heated. There is no gas supply to the village and generally existing properties heat using oil. It is noted that the layout drawing refers to a possible underground gas storage tank. It is believed that present legislation will not permit this and there appears to be no allocated space for heating oil tanks. There is a requirement to provide Public Open Space in a new development, this does not seem to have been allowed for in this design. The design shows a generic urban housing estate transposed onto a rural site taking no regard of the location or ground contours. Use of the existing access, so keeping the hedge bank, and making use of the ground contours to make the development less intrusive has not been considered.
Page 25, Density and Capacity	The development will provide 13 affordable dwellings on a site of c.0.32 Ha, therefore resulting in acceptable density within policy guidelines. The layout allows for a variety of housing types, sizes and settings to enable choice.	The proposed development for 13 dwellings with 22 bedrooms is not appropriate for this location due to the limited facilities in the village and the lack of any public transport. The density of dwellings at 40 units per hectare is well in excess of the recommendation in the Local Development Plan, June 2017, of 25 dwellings per hectare for minor rural settlements.

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Page 25 Boundary treatments	Boundary treatments can have a significant impact of the overall quality of the public realm by defining spaces, influencing character and perceptions of security. The scheme will include the us timber fencing and recon stone walls.	The proposed access and frontage to the is not appropriate for this location and is out of keeping with the village and is visually intrusive. Walls constructed of reconstituted stone are not used in the village and this form of construction is not appropriate. A length of established hedge bank is being removed, this should be re-instated on both visual and ecological grounds.
Page 28, Waste	Suitable storage facilities for bins and recycling will be provided to ensure that they do not Have a detrimental visual effect on the quality and character of the place while still being accessible for refuse collection. Sufficient space has been provided on each plot for the storage of wheelie bins.	The Vale of Glamorgan does not use wheelie bins but a multitude of different waste containers. Space will be required to store these.
6 Access		
Page 29, Inclusive Access	The site is located within the settlement of Llancarfan where access on foot, cycle is good. The proposed development moves away from streets dominated by the needs of vehicles, ensuring they become based on safer places that people feel comfortable to use.	Presumably this statement relates to the roads within the development. Once outside the development the needs of vehicles, particularly heavy farm vehicles takes precedence. There are limited pavements in the village and walking or cycling on the narrow lanes presents a significant risk to pedestrians and cyclists.
Page 29, Cycle Routes	The bicycle routes will utilise the same movement networks as vehicles and pedestrians. This is deemed suitable given the low vehicle speeds promoted through the design layout and the Rural character of the village.	Presumably this statement relates to the roads within the development. Once outside the

	development there are no cycle routes within the village. There are no speed limits on the roads through the village. Road traffic is dominated by heavy farm vehicles.