

From: Clerk [REDACTED]
Sent: 29 January 2026 09:14
To: LDP [REDACTED]; Robinson, Ian [REDACTED]; Chief Executive [REDACTED]
Subject: Formal Objection to the Proposed Allocation of Eastbrook (DNP H1) in the Replacement Local Development Plan (RLDP)

Dear Ian, LDP Team and Rob Thomas

Re: Formal Objection to the Proposed Allocation of Eastbrook (DNP-H1) in the Replacement Local Development Plan (RLDP)

Dinas Powys Community Council submits this formal objection to the proposed allocation of the Eastbrook site (SP4 KS2) within the Vale of Glamorgan Replacement Local Development Plan (RLDP). The Eastbrook allocation remains fundamentally flawed due to unresolved constraints relating to:

- Flood risk and hydrology
- Highways and transport capacity
- Environmental and landscape impact
- Infrastructure limitations
- Deliverability and viability

The site lies within a hydrologically sensitive catchment characterised by groundwater emergence, overland flow routes, low-permeability soils, and a history of significant flood events, including the 2020 incident. Natural Resources Wales (NRW) has repeatedly raised concerns about flood risk at this location, and the Council's own evidence base acknowledges the need for catchment-wide modelling before any development can be considered.

The RLDP does not currently include:

- Mandatory policy wording to secure pre-delivery of mitigation
- Requirements for catchment-wide modelling
- Guarantees that development will not increase flood risk elsewhere
- Evidence that mitigation is viable, deliverable, and enforceable

Without these safeguards, the allocation fails several tests of soundness, including **CE2, CE3, and CE4**.

Eastbrook in Dinas Powys is considered to be in a high-risk flood area. It is located within the catchment of the Cadoxton River and its tributary, the East Brook, which have a history of overflowing, causing significant, frequent flooding to homes and roads.

River and Surface Water Flooding: The area experiences flooding from the East Brook and the River Cadoxton. Intense rainfall can also overwhelm the surface water and sewerage systems, causing additional property flooding.

High Water Levels: The ground in the area, particularly in fields adjacent to existing properties, is often described as "totally waterlogged" for significant portions of the year, indicating a high-water table.

Key details regarding flood risk in this area include:

High Risk Area: Natural Resources Wales (NRW) has identified a significant risk of flooding from the Cadoxton River and East Brook, affecting areas like St Cadocs Avenue, Greenfield Avenue, Elm Grove Place, and Cardiff Road.

Significant History: The area has experienced multiple flooding events, including major incidents in 1948, 1986, 1998, 1999, 2008, 2012, 2013, and a severe event in December 2020 where approximately 40-100+ properties were affected.

Future Risk: Due to climate change, the number of properties at risk of flooding in the area is expected to increase from nearly 200 to over 350 by 2117.

Causes: The area suffers from rapid runoff from the surrounding hillsides, which overwhelms the capacity of the river channels and drains.

NRW has been exploring options for a flood management scheme, including natural flood management and potential engineering solutions, to reduce the risk to the community. It is recommended to check the specific, up-to-date flood map for any particular property on the NRW website.

The Dinas Powys Community Council formally requests written confirmation from the Vale of Glamorgan Council addressing the following matters:

1. **Has a catchment-wide hydraulic model** has been commissioned, completed, and agreed with NRW? If so, does the model demonstrate no **increase in flood risk** to existing properties?
2. Have groundwater emergence, overland flow routes, and the 2020 flood event have been assessed?
3. Are SuDS viable given soil and groundwater constraints?
4. Has downstream drainage capacity been assessed and, if necessary, upgraded?
5. Will education, healthcare, utilities, and highways infrastructure be expanded to support the allocation?
 - a) Has consultation taken place with the GP surgery/Local schools?
 - b) What additional services will be provided?
6. Have deliverable and funded mitigation for transport and highways impacts been identified?
 - a) Please provide figures of air pollution and traffic flow surveys along Cardiff Road. What is the capacity along Cardiff Road?
 - b) Department of transport will not be investing in Eastbrook station. Therefore, no lift/ramp to address the needs of the community. Yet it is being used to form a decision about the housing. Please explain the reason behind this?
7. Have landscape, biodiversity, and green-infrastructure assessments been completed?
 - a) Apparently the placemaking workshop has helped refine proposals. What are the refinements and when can we see the results from the surveys people completed at the Murchfield consultation?

In the opinion of Dinas Powys Community Council these confirmations are essential to demonstrate that the allocation is sound and that development will not increase flood risk or place unacceptable pressure on local infrastructure.

The Vale Council state that millions of pounds of Dinas Powys S106 funding could be moved to Myrtle Close in Penarth as 'there are no developments' in Dinas Powys. If this is the case Eastbrook needs to be removed from the RLDP or the money should stay allocated to Dinas Powys.

The Vale Council allocated 900-1500 houses for Argae lane. But once the site was considered not viable the figures were reviewed and they were reduced in number and moved to another site.

- Where is the evidence that 250 houses are needed in Eastbrook?
- The Eastbrook site was turned down before. Why? What has changed to make it viable now?
- Have the Vale Council exhausted all the key sites outlined in the previous LDP and if not why?
- Have the Vale Council used all of their rolled forward housing sites?
- Have the Vale Council carried out a Sequential Test? Proving there are no lower risk sites available?
- Has the Exception test been carried out? Ensuring the development will be made safe throughout its lifetime without increasing floor risks elsewhere?
- Out of the 250 houses 40% will be affordable housing. Managed by housing associations according to Persimmon glossy proposal. What is classed as affordable housing?
- Birth rate has fallen for a number of years, and the elderly population is increasing. How do you justify these figures? What proportion of the proposed 250 houses will be age friendly?

In the appendix to the Homes and Safe Communities Scrutiny Committee report (6th January 2024), there is a comment regarding the need for bungalows. Residents and councillors enquired about bungalows enabling people to downsize and free up family homes. We were told they are providing what the Vale has requested. We met with housing and they said, 'it won't happen'. So knowing there is a need for elderly accommodation what is the plan to address this need?

By 2034, 1 in 4 will be over the age of 65. This is an increase of 75% from 9.3% in 2018 to 13.7% in 2038.

The Vale indicates 70% of the housing need is in Barry/Penarth and Llandough. Of the remaining 30% what percentage is allocated to Dinas Powys? You state greatest areas of demand are Penarth/Barry and Llandough but there is no mention of Dinas Powys.

In conclusion, in the absence of the required evidence and mandatory policy safeguards, the Eastbrook allocation remains unsound. The Dinas Powys Community Council therefore requests that the Vale of Glamorgan Council:

- **Removes the Eastbrook allocation from the RLDP, or**
- Incorporates the mandatory policy wording and evidence requirements set out above.

We look forward to receiving your written response.

Yours faithfully,

Jeanette Haigh,
Clerk on behalf of Dinas Powys Community Council