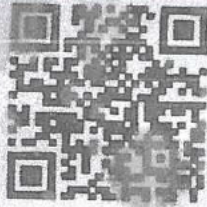


Vale of GLAMORGAN



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Representor No.

Date Received.

Date of Acknowledgement

Vale of Glamorgan Replacement Local Development Plan 2021-2036

HG1 KS2 DEPOSIT PLAN CONSULTATION

Public Consultation Representation Form

The Council is seeking your views on the Replacement Local Development Plan (RLDP) **Deposit Plan**. The Deposit Plan is the next formal stage in the development plan preparation process and expands on the Preferred Strategy which the Council consulted on in December 2023 – February 2024.

The Deposit Plan is the full draft version of the RLDP, detailing the **overall strategy, development policies, land designations** (e.g. conservation) and **specific land allocations** for development (including new housing and employment sites) over the 15-year period 2021-2036.

The public consultation will run for 6 weeks between **Wednesday 28th January 2026 and Wednesday 11th March 2026**. Representations received after this time will not be considered.

Full details of the consultation are available on the Council's website at: www.valeofglamorgan.gov.uk/ldp or by scanning the QR code above.

The Council encourages representations on the Deposit Plan to be made via our **online consultation portal** available at <https://valeofglamorgan.oc2.uk/> however representations submitted using this form will also be accepted.

Representations are welcomed in both Welsh and English and this representation form is available in other formats on request e.g. Welsh, large print.

1: Contact Details

Your / Your Client's Details			Agent's Details (if relevant) *		
Title	Mr		Title		
Name	Minkwell Scott-Cook		Name		
Organisation (If applicable)	ASIAN STRATEGY CONSULTANTS		Organisation (If applicable)		
Address			Address		
Postcode			Postcode		
Email			Email		
Telephone No.			Telephone No.		
Communication preference: (Please tick)	Email	☐	Communication preference: (Please tick)	Email	☐
	Letter	☒		Letter	☐
Language preference: (Please tick)	English	☒	Language preference: (Please tick)	English	☐
	Welsh	☐		Welsh	☐

*If you are acting as an Agent, please also provide details of person/organisation you are representing (Note: you will need to supply a separate form for each person/organisation you are representing).

10th March 2026

Max Scott-Cook

Vale of Glamorgan Council
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Dear Vale of Glamorgan Council

Ref: Objection to RLDP and Site Ref: HG1 KS2 – Max Scott-Cook

Please find below my objections to the RLDP and Site Ref: HG1 KS2 – the proposed development of 250 homes in Eastbrook, Dinas Powys Vale of Glamorgan (Ref:444).

It is framed specifically for Welsh Planning Practice, TAN guidance, Welsh Government Policy and Fire and Rescue Expectations in Wales.

Additional Objections of; Hard Constraints not being adhered to, the suppression of Reporting on Dinas Powys Flooding in the RLDP, Policy Conflicts and Contradictions, Increased levels of traffic and pollution, Failure to identify the protected and endangered wildlife species evident within the proposed development area, and the increase of additional Patients to adversely affect and impact the quality of NHS services within our community.

My objections are as follows:

1. Objection: Requirement for Two Accesses for Developments Over 100 Dwellings (Wales)

1.1 Summary Position

The proposed development exceeds 100 dwellings yet relies on a **single point of access** to the public highway.

In the Welsh context, this is **not acceptable**.

While no single statute sets a numeric threshold, the combined weight of:

- **Planning Policy Wales (PPW11)**
- **TAN 18: Transport**
- **Welsh Fire & Rescue Service operational requirements**
- **Manual for Streets (as adopted in Wales)**
- **Local Highway Authority practice across Welsh authorities**
- **Appeal precedent in Wales and England**

creates a **clear and compelling expectation** that large residential schemes must provide **two independent access points**, or at minimum a **fully engineered emergency-only secondary route**.

The proposal fails to meet that expectation and therefore presents an **unacceptable risk to life, property, and network resilience**, contrary to national policy and good practice.

1.2 Planning Policy Wales (PPW11): Network Resilience and Safety

PPW11 places **network safety and resilience** at the heart of transport planning.

Key principles include:

- **PPW11 §4.1.9** – development must ensure “safe, efficient and reliable” access.
- **PPW11 §4.1.31** – transport infrastructure must be “resilient to disruption”.
- **PPW11 §4.1.52** – planning must support emergency access and avoid creating unsafe environments.

A single access serving over 100 dwellings is **inherently non-resilient**.

If blocked by:

- a collision,
- a fallen tree,
- flooding,
- a utilities failure,
- or even routine roadworks,

the entire estate becomes **inaccessible to emergency services**, directly undermining PPW’s requirement for **resilient, safe access**.

1.3 TAN 18: Transport – Safe Access and Emergency Provision

TAN 18 does not set a numeric threshold, but it is explicit that:

- **Access must be safe for all users at all times.**
- **Emergency access must be maintained under all foreseeable conditions.**
- **Layouts must avoid single points of failure.**

TAN 18 repeatedly emphasizes the need for **robust access arrangements** and the avoidance of designs that compromise emergency response.

A single access serving a large population is the textbook example of a **single point of failure**.

1.4 Welsh Fire & Rescue Service Requirements

Fire & Rescue Services in Wales (South Wales, Mid & West Wales, and North Wales) consistently advise that:

- **Large residential developments should not rely on a single access.**

- A secondary access or emergency-only route is required where more than ~100 dwellings are served.
- Blocked access routes are a critical risk factor in fire fatalities and delayed response times.

This is grounded in:

- The Fire and Rescue Services Act 2004 (duty to respond effectively).
- Approved Document B (access for fire appliances).
- BS 9991 (resilient access for residential developments).

In practice, Welsh fire authorities routinely object to single-access schemes above 100 dwellings unless a **fully engineered, unobstructed emergency route** is provided.

1.5 Manual for Streets (MfS) – adopted in Wales stresses

- Network permeability
- Avoiding cul-de-sacs serving large populations
- Ensuring emergency access under all conditions

MfS does not set a numeric threshold, but its design philosophy is clear:
Large developments must not depend on a single access point.

1.6 Local Highway Authority Practice Across Wales

Across Welsh LPAs, the working norm is:

- Up to ~100 dwellings – single access may be acceptable if geometry is excellent.
- 100–150 dwellings – strong justification required; emergency access normally mandated.
- 150+ dwellings – two accesses are expected as standard.

Authorities including:

- Vale of Glamorgan
- Cardiff
- Rhondda Cynon Taf
- Carmarthenshire
- Flintshire

all routinely require **two accesses or a dedicated emergency route** for schemes of this scale.

This reflects **risk-based practice and lessons learned from blocked-access incidents.**

1.7 Appeal Decisions: Consistent Support for Two Accesses

Inspectors have repeatedly upheld refusals where:

- A single access serves >100–150 dwellings, and
- No secondary emergency route is provided.

Key themes in appeal reasoning include:

- **Unacceptable risk to life and property**
- **Failure to ensure resilient access**
- **Conflict with national policy on safe and reliable transport networks**
- **Over-reliance on a single vulnerable point of access**

Conversely, appeals succeed only where:

- A **fully engineered emergency-only link** is provided, or
- The dwelling count is significantly lower.

The proposed development falls squarely into the **high-risk category**.

1.8 Risk Assessment: Why a Single Access is Unacceptable

A single access serving over 100 homes creates:

1. Life-safety risk

Emergency services may be unable to reach residents during:

- fires,
- medical emergencies,
- flooding,
- or road obstructions.

2. Evacuation risk

Residents may be unable to leave during:

- fire events,
- gas leaks,
- or environmental hazards.

3. Infrastructure vulnerability

One incident can isolate the entire estate.

4. Policy conflict

Fails PPW11, TAN 18, and the Fire & Rescue Services Act duty to maintain effective response capability.

1.9 Conclusion

The proposal's reliance on a **single access** for a development of 250 dwellings is:

- **Contrary to PPW11 (safe, resilient access)**

- **Contrary to TAN 18 (avoid single points of failure)**
- **Contrary to Fire & Rescue operational requirements in Wales**
- **Contrary to Manual for Streets principles**
- **Contrary to established Welsh LHA practice**
- **Unsupported by appeal precedent**

The development therefore presents an **unacceptable and avoidable risk** to residents and emergency responders.

A **second access**, or at minimum a **fully engineered emergency-only route**, is **essential** to make the scheme safe and policy-compliant.

2. Objection: Hard Constraints have not been Adhered To

2.1 Highways says that Persimmon cannot pencil in the ‘secondary’ or ‘emergency’ access. Persimmon Failed to Do a Traffic Study to Contest Highways View.

2.2 There is no Proposal to bring pedestrian or cycle access up to Welsh Government Standards.

2.3 The Proposed George’s Row and Seel Park routes to Eastbrook Station and Camms Corner shops do not work.

2.4 The highway adjacent to the site and providing ingress and egress to any homes built there is on the most congested road within the Vale of Glamorgan. As such it is deemed as traffic sensitive under the terms of the New Roads and Street Works Act 1991. Any planned development is clearly contradictory to both the spirit and the intention of the legislation.

2.4 Risk Assessment: Why Failure to Provide this Information is Unacceptable

The highway proposal for this scheme is deemed as traffic sensitive under the terms of the New Roads and Street Works Act 1991. Any planned development is clearly contradictory to both the spirit and the intention of the legislation.

Highways advise that the above points are a Welsh Government Requirement for all new developments. This information has not been provided. The RLDP Team need to answer these hard constraints as well as report on amending the draft, prior to any approval.

3. Objection: JBA Consulting Suppressed Dinas Powys Flooding in the RLDP Documents (Wales)

3.1 Risk Assessment: Why Failure to Report this Information is Unacceptable

Their Strategic Flooding Assessment (SFCA) had to record details of historical flood events, yet omitted the Dec. 2020 flooding of 100 homes in Dinas Powys. This same company (JBA Consulting), wrote its Section 19 legal report in 2021. Their SFCA just mentions that the flooding measures dealt with the problem – yet their 2021 report:

Recommends that NRW assess viability of options to manage the flood risk across Dinas Powys; for DCWW to assess the viability of offline storage for the Cae'r Odyn surface water system.

There appears to be a cover up of these measures that have been clearly ignored. On their map, located on the last page of the SFCA, that proposes woodland planting to hold-back rainstorm run-off, on part of the proposed Persimmon's Eastbrook site. The map is only indicative giving no source for the data. A full survey is still required.

The reports that are provided, need to be accurate, honest, transparent and compliant with legislation and policy. This is not. A full survey needs to take place to establish the full potential for flooding measures within Dinas Powys and the proposed Eastbrook Development Site.

4. Objection: Policy Conflicts and Contradictions

4.1 Policy Conflict: Fails PPW11, TAN 18, and the Fire and Rescue Services Act – A duty to maintain effective response capability.

4.2 The proposal's reliance on a single access for a development of 250 dwellings is Contradictory:

- Contrary to PPW11 (safe, resilient access)
- Contrary to TAN 18 (avoid single points of failure)
- Contrary to Fire and Rescue Operational Requirements in Wales
- Contrary to Manual for Streets principles
- Contrary to established Welsh LHA practice
- Unsupported by appeal precedent

The development therefore presents an unacceptable and avoidable risk to residents and emergency responders.

A second access, or at minimum, a fully engineered emergency only route, is essential to make the scheme safe and policy compliant.

4.3 The Welsh Government has placed a physical and ideological moratorium on the building of new roads, an example of this is the blocking of a by-pass around Dinas Powys:

The proposed plans show the building of roads on the proposed development to serve the new residents. This is clearly contradictory to the stated aims and rules imposed by the Welsh Government

5. Objection: Additional

5.1 Unacceptable Increased Levels of Traffic on Cardiff Road Resulting in Increased Air Pollution:

With the proposal of 250 plus, additional dwellings, assuming a minimum of two car each house hold, that is an increase of a minimum of 500 cars (although many households have 3 cars, 1 each plus a works vehicle), that will require access onto Cardiff Road and produce increased air pollution. This is unacceptable. For the Local Authority appointed consultant to advise that there is an unlikely increase in pollution levels is both implausible and raises issues of competence, and integrity and should be questioned further.

5.2 Failure to Undertake the Appropriate Environmental Studies, at the Relevant Times of the Year to Assist in Identifying the Protected and Endangered Species Evident within the Proposed Development Area:

These protected and endangered species present include:

- **Hazel Dormice:** These are found in the woodlands and hedgerows adjacent to the Eastbrook fields.
- **Otters:** Evidence of otters, which are protected, have been recorded in the vicinity of the Eastbrook.
- **Bats:** Various species of bats, which are protected, use the area for foraging and commuting.
- **Badgers:** These are present and are protected, given the suitable habitat.
- **Kingfishers:** These protected bird species are noted in the area.
- **The High Brown Fritillary Butterfly:** one of the UK's most threatened species, is found in the fields of Eastbrook, as well as throughout the Vale of Glamorgan
- **Gold Crested Newts:** endangered and protected, have been identified in the fields.

5.2.1 Summary:

This proposed development area, known as greenfield sites in Eastbrook, Dinas Powys, serve as a vital habitat and corridor for this wildlife.

Appropriate environmental and ecological studies and reports need to be carried out, at the relevant times of the year, specifically focusing on the above noted and sited endangered species, in and around this proposed development area.

5.3 Additional Patients to Adversely Impact Current and Existing Quality of Services and Resources.

The likelihood of an excess of 500 new patients being registered at the Dinas Powys Medical Centre will further impact and degrade the quality of services afforded to local residents, which are already far below standards prescribed by the Welsh Government.

6. Conclusion:

This development would clearly have a substantial negative and adverse impact on the residents and wildlife of our local community, and is completely contradictory to any Local Authority or Welsh Government stated aim to protect or even improve the community in which we live.

It is also contradictory the stated commitment to nature, climate, land and biodiversity. The LA and Welsh Government declared a nature emergency in 2019 and then again in 2021, and this proposed development, as well as the lack of genuine and actual reporting regarding the endangered and protected species of wildlife, is in complete contradiction to this. (7 Key Site Supporting Information >KS2 Land North of Dinas Powys>Green Infrastructure Statements)

I would urge the Councilors within the Vale of Glamorgan Local Authority to abandon this proposed development plan while they are still in a position of authority to do so.

I would be grateful for confirmation that my objections have been formally received and noted.

I trust that the Vale of Glamorgan Council will now withdraw the RLDP and abandon this proposed development plan for Eastbrook, Dinas Powys.

Kind Regards



27/03/2026

Max Scott-Cook