

# HG1 KS1 - LAND AT NORTH WEST BARRY

## RLDP public consultation feedback

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Reference: RLDP-OBJ-RVN-004

### **Objection re: HG1 KS1: Community Infrastructure**

Including Active Travel, Social Cohesion, Environmental Health, Education,

#### **Community Infrastructure**

I object to the proposed allocation of Land at North West Barry (HG1 KS1) based on significant concerns raised by examination of *BP37 – Primary, Community & Intermediate Health Care* along with the clear and repeatedly stated risks identified in the *BP3 Rapid Participatory HIA of the Preferred Strategy (2023)* and *BP3A Rapid Participatory HIA of the Deposit Plan (2025)*

The Deposit RLDP fails to demonstrate that sufficient **healthcare infrastructure** (particularly primary and community care) will be delivered in step with growth. Close reading of *BP37 – Primary, Community & Intermediate Health Care* shows there is no identifiable set of mitigations, no delivery programme, no capital plan, and no agreed actions with Cardiff & Vale University Health Board (CAVUHB) to manage or expand healthcare capacity in response to the growth proposed in the RLDP.

BP37 contains extensive description of pressures, including:

- 24% increase in registered population since 2015 and further growth expected.
- Significant growth in the 65+ population and prevalence of long-term conditions.
- Workforce shortages, premises constraints, dental access issues, mental health pressures, and long secondary-care waits.

However, nowhere in BP37 is there:

- a list of healthcare infrastructure projects to be delivered
- costs, funding sources, or capital commitments
- timelines or delivery windows
- agreed expansion of GP practices or primary care hubs
- S106 / CIL contribution mechanisms
- phasing triggers tied to housing delivery
- CAVUHB implementation plan
- any actual mitigation measures for the increase in demand

BP37 explicitly highlights cross-boundary pressures, but without solutions. For example, it acknowledges cross-boundary flows where residents from eastern and western Vale access healthcare in Cardiff or Cwm Taf Morgannwg. It highlights the need for “continued collaboration” and “capacity planning” across HB boundaries. Yet again it provides no evidence of joint capacity modelling; agreed service expansion; an investment plan; any commitment from either CAVUHB or the Council.

It is an assessment document, not a mitigation or delivery document. This is a critical gap, because the RLDP allocates 7,890 dwellings across the Vale, all of which will significantly increase demand for primary and community healthcare. Yet BP37 provides no mitigation pathway for any of these settlements. Therefore, how can I have been properly consulted in this respect?

Because of this, the RLDP risks failing Welsh Government policy tests of soundness:

CE2 — coherence and effectiveness

CE3 — deliverability

CE4 — consistency with national policy (Planning Policy Wales)

Likewise, taking into account the content of *BP3 Rapid Participatory HIA of the Preferred Strategy (2023)* and *BP3A Rapid Participatory HIA of the Deposit Plan (2025)*, both HIAs raise substantive risks to health, wellbeing, inequalities, and service capacity.

Both HIAs warn that if new development comes forward without simultaneous delivery of GP, social care, open space and community facilities, significant negative health impacts occur and car dependency rises.

When applied to North West Barry development (HG1/KS1), this indicates that this site is an unsuitable, high-risk site - preliminary enquiries indicate that the only local GP practice within access of North West Barry (Highlight Park) is already oversubscribed and struggling to deliver the expected level of service for existing residents. The HIAs repeatedly highlight the danger of early phases of development outpacing healthcare, social care and community infrastructure capacity.

With particular reference to the North West Barry site, the only specific reference to **any** measures to mitigate these serious and significant infrastructure concerns is a vague statement promising “*an off-site financial contribution towards the provision or enhancement of community facilities in the area*”. Even more concerning, is the likelihood that this will be delivered *after* need develops, *not* before. The Deposit HIA explicitly flags that increased population without matching capacity can overstretch GP access and reduce service availability for existing residents.

Furthermore, in light of Persimmon Homes’ documented track record of failure to deliver legally-agreed S106 funding mitigation measures, this brings the whole inclusion of North West Barry site in the RLDP into question.

The RLDP allocation is therefore not Sound because the plan does not ensure timely, certain, or adequate delivery of health-critical infrastructure.

### **Active Travel / environmental health risks**

The HIAs warn that active travel must be safe, direct, and attractive or it will fail. North West Barry cannot deliver this due to its severance by major roads, and in particular, its inherent location and topology which places it an arduous uphill 30–40-minute walk

from the nearest train station. No manner of active travel measures can change this simple fact: **it is the wrong location** to build 376 houses.

The 2025 HIA states that active travel requires safe, well-lit, continuous, connected, inclusive routes, and must be designed as the easiest and most attractive option.

The 2023 HIA highlights that behaviour change is extremely difficult where car dependence is entrenched or where routes are unsafe or indirect. Yet the NW Barry site is isolated by the A4226 and relies on the already-heavily-congested and unsafe Weycock Cross junction.

The HIA findings are:

- Severance by arterial roads undermines walkability.
- Major junctions without transformational redesign deter walking and cycling.
- Active travel routes along high-traffic corridors expose users to air pollution and noise—both HIA-identified health risks.

The site cannot fulfil the RLDP's health and transport objectives as required by its own evidence base.

The HIAs highlight significant concerns about noise, air pollution and cumulative environmental hazards—conditions that are unavoidable at this site. The Preferred Strategy HIA identifies traffic noise, air pollution, respiratory impacts and cumulative noise from heat pumps as major health risks requiring strong mitigation.

In addition, it is worth noting that in **none** of the three provided TA's (Strategic Transport Assessments) contained within the RLDP evidence base is **any** reference made to any Air Quality Assessments having been undertaken for or as part of these TA's.

The Deposit HIA confirms similar concerns and adds that safe, healthy environments require:

- tree planting to mitigate noise and pollution
- reduced car dominance
- safeguards against environmental degradation.

However, the North West Barry site sits directly on a principal trunk route (A4226), adjoining Weycock Cross, one of the Vale's most congested junctions. Exposure to transport-linked air pollution and noise is therefore inherent and unavoidable, not mitigable through design alone.

The HIAs demonstrate that the environmental health risks at this location are too great to justify residential allocation.

## **Social Cohesion**

The HIAs emphasise the importance of social cohesion, community space and safe public realm, yet the site's design constraints make this unachievable.

The 2025 HIA warns against “designing out” legitimate social interaction and stresses the need for community-led, inclusive, intergenerational public spaces. The 2023 HIA stresses that poorly designed developments can limit social interaction, increase isolation, and exacerbate inequality. North West Barry is a peripheral, edge-of-town site with limited permeability and weak natural connections to established neighbourhoods. The risk of creating a socially disconnected, car-dependent estate is therefore substantial.

### **Summary:**

The site is structurally incapable of supporting the health-enabling placemaking envisaged by SP4 or the HIAs.

Development at the North West Barry is incompatible with HIA evidence

Bringing both HIA findings together, the allocation of NW Barry conflicts with:

- Health Inequality Mitigation: The site would place substantial new population adjacent to some of the Vale’s most health-vulnerable communities without providing guaranteed uplift in services or infrastructure.
- Environmental Health Requirements: Exposure to air pollution and noise at this location directly contradicts HIA recommendations.
- Safe and Effective Active Travel: The site cannot deliver the direct, safe, comfortable active travel networks the HIAs identify as essential.
- Infrastructure Phasing: Healthcare, education and community infrastructure cannot be guaranteed early enough to prevent negative impacts.
- Social Cohesion: The edge-location and severance barriers undermine the inclusive, connected, community-supportive placemaking the HIAs require.

Based on the evidence within the Council’s own Health Impact Assessments, the allocation of Land at North West Barry (HG1 KS1) is neither sound, nor justified, nor deliverable without causing avoidable and disproportionate harm to public health and health equity. The allocation HG1 KS1 be removed from the RLDP. It cannot be claimed that I have been consulted with when a full, site-specific Health Impact Assessment has not been completed. The current evidence clearly demonstrates the site is not appropriate.

### **Education provision**

On careful review of *BP43 – Education*, I can see that the Vale of Glamorgan’s own RLDP evidence shows that Barry’s schools cannot absorb the demand from the proposed 376-home Weycock Cross development:

Barry Primary Schools:

- The Barry cluster already contains 4,769 pupils across English-medium, Welsh-medium, CIW, RC and Special streams
- Pressure is already high: several schools show deficits in the Area Data Matrix (BP43 pp. 20–58). Welsh-medium demand is ~19.6% of Barry pupils, way above average, meaning specialist WM capacity must also grow.

#### Barry/Regional Secondary Schools:

- Secondary catchment totals 12,107 learners, with nearly 80% in English-medium and ~11% in Welsh-medium
- The RLDP's Area Data Matrix shows a secondary deficit of more than 1,000 places under RLDP growth
- No Barry secondary school currently has spare capacity to absorb new demand.

#### Special & ALN Provision:

- ALN deficits are flagged in red within the Area Data Matrix, meaning no cluster has adequate ALN capacity

Using the Council's own multipliers from the Education Cost Table, Weycock Cross would generate:

- Nursery (0.10 per dwelling) → 38 pupils
- Primary (0.278 per dwelling) → 105 pupils
- Secondary 11–16 (0.208) → 78 pupils
- Post-16 (0.04) → 15 pupils

#### Language share (based on Barry patterns):

- Primary: ~67 English-medium, ~21 Welsh-medium, remainder faith/ALN.
- Secondary: ~62 English-medium, ~9 Welsh-medium.

These numbers must be accommodated somewhere, but the RLDP does not say where.

The Council's own costing shows £27,558 per dwelling is needed for education build costs. For 376 dwellings that's: £10,361,808 education cost BEFORE land or external works. The council hasn't addressed the funding gap - no school expansions, new sites, or S106 costings have been published for Weycock Cross.

The RLDP and the developer have not provided any detail on:

- where the 105 primary and 78 secondary pupils will go
- which schools will expand (and whether they physically can)
- how Welsh-medium and ALN capacity will be delivered
- how the £10m+ funding requirement will be met
- any phasing that prevents homes being occupied before school places exist.

As per my objections raised separately under **Community Infrastructure**, the only specific reference to **any** measures to mitigate these serious and significant

infrastructure concerns is a vague statement promising “*an off-site financial contribution towards the provision or enhancement of community facilities in the area*”.

Until this information is published, the Weycock Cross allocation is not deliverable, not compliant, and not justified. This is a soundness failure under planning law - deliverability, infrastructure capacity, national policy compliance.

Conclusion: How can I be considered to have been consulted on community infrastructure when there is such a lack of information and transparency in all these key areas?