

HG1 KS1 - LAND AT NORTH WEST BARRY

RLDP public consultation feedback

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Reference: RLDP-OBJ-RVN-003

Objection re: HG1 KS1: Heritage

The RLDP takes a narrow view of ‘heritage’ and I object to the plan outlined in the *Heritage Assessment* commissioned by Persimmon (June 2025) because the assessment is inadequate, does not meet national policy requirements, and therefore should not be used as evidence to justify allocation of this land for development.

Non-compliance with PPW Edition 12 (2024)

- Failure to assess significance, contrary to PPW Chapter 6: PPW Edition 12 is clear that planning authorities must protect, conserve and enhance the historic environment as part of creating “Distinctive and Natural Places.” It emphasises that heritage assets - designated or not - form part of the cultural well-being of Wales and must be assessed in terms of significance and impact on that significance. However the developer’s assessment:
 - does not identify the *significance* of each affected heritage asset
 - does not explain how development would affect that significance
 - relies solely on distance and visibility rather than the holistic considerations required by PPW.

This falls well below the standards set by PPW for assessing the historic environment within the plan-making process.

- There is no consideration of cumulative or incremental harm - PPW requires a long-term, sustainable approach to placemaking, including the protection of historic character and the prevention of gradual landscape erosion. However, the assessment:
 - ignores previous historic encroachment on the rural setting of Barry
 - does not examine whether further development contributes to incremental loss of historic landscape
 - uses past erosion as justification for more, which directly contradicts PPW’s placemaking principles.

Non-compliance with Cadw’s “Setting of Historic Assets in Wales” Guidance

- Incorrect definition of setting - Cadw defines setting as the surroundings in which an asset is understood, experienced, and appreciated, stating explicitly that setting includes tranquillity, remoteness, historic relationships, topography, and is not restricted to visibility alone. However, the developer’s assessment:
 - treats “no intervisibility” as “no impact”
 - ignores experiential qualities such as rural tranquillity, historic context and landscape coherence

- does not acknowledge that setting is dynamic and may be harmed even without direct views.

This approach is fundamentally out of step with Cadw's definition.

Failure to apply the required four-stage setting methodology

- Cadw requires that all heritage assessments follow a structured four-stage method:
 1. Identify the asset
 2. Define and analyse its setting
 3. Assess the impact of change
 4. Consider mitigation

The assessment does **none** of these, there is:

- no setting analysis for individual assets
- no asset-specific impact evaluation
- no discussion of mitigation
- no documentation of methodology as Cadw requires.

As a result, the assessment cannot be considered robust or policy-compliant.

No asset-specific evaluation despite proximity to multiple historic sites

- There are listed buildings within ~350–420m (Cwm Ciddy Farm) and numerous designated heritage assets within 1–2 km (Scheduled Monuments, Registered Historic Parks and Gardens, Conservation Areas). However the assessment:
 - simply lists these assets without assessing their setting or sensitivity
 - provides no evaluation of how suburban expansion may alter their rural historic context
 - does not recognise the role of the surrounding fields in forming the historic approach to Barry and Porthkerry

Cadw requires each asset's setting to be analysed individually, with evidence—this has not been done.

Unsubstantiated dismissal of the historic landscape value

- LANDMAP identifies the area as part of a Historic Landscape Aspect Area of "Moderate" value, with surviving regular fieldscapes. The assessment dismisses this without evidence, claiming the field pattern is "already altered." However:
 - PPW requires recognition of the distinctive historic character of places, whether designated or not
 - Cadw confirms that setting impacts apply to all historic assets, irrespective of designation.

The assessment provides no justification for disregarding this historic character.

Insufficient information for LDP evidence base, contrary to PPW

- Cadw states developers must provide “sufficient, but proportionate information” to allow authorities to assess impacts. However, the assessment:
 - contains no photomontages
 - contains no setting diagrams
 - contains no significance analysis
 - presents conclusions unsupported by evidence

This is inadequate for LDP allocation and fails the PPW requirement for robust evidence.

Commissioned by the developer – risk of partiality

While it is standard for developers to commission their own heritage work, PPW and Cadw expect balanced, transparent, and methodologically sound assessments. Given the clear departures from both PPW and Cadw guidance, the LPA must be cautious in relying on an assessment commissioned by a party seeking to minimise constraints.

Conclusion: Heritage evidence is not sound and cannot support allocation

The heritage assessment:

- does not comply with PPW Edition 12 (2024)
- does not comply with Cadw’s Setting of Historic Assets guidance
- does not include adequate evidence to assess impacts
- overlooks cumulative and experiential impacts
- fails to evaluate individual assets or their significance
- presents conclusions unsupported by analysis.

On this basis, the heritage assessment does not pass the soundness test and is insufficient justification for removal of this land from the Green Wedge, or indeed for its inclusion for development in the RLDP.