

HG1 KS1 - LAND AT NORTH WEST BARRY

RLDP public consultation feedback

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Reference: RLDP-OBJ-RVN-002

Objection re: HG1 KS1: Sustainable Transport and Highways

I object to the inclusion of land at Weycock Cross (North West Barry) being included in the RLDP because of the impact on congestion, air and noise pollution and the lack of viable active travel and public transport options. Review of the RLDP supporting documents evidence base exposes clear contraventions with **PPW12 (Chapter 6)**, **TAN 18** and **Well-being of Future Generations Act**.

Across all three RLDP Strategic Transport Assessment documents (*BP14 Strategic Transport Assessment - Stage 1 / BP14A Strategic Transport Assessment - Stage 2 / Persimmon Homes/Asbri Draft Transport Assessment*) the data, modelling and conclusions contained within demonstrate that:

Congestion:

- Weycock Cross *already* operates close to capacity (RFC >0.8) at peak times of day and will frequently operate *over* capacity in future as a result of the proposed RLDP development, even if *only* the North West Barry site is considered. In its own modelling, BP14A explicitly shows critical failure in the 2036 RLDP scenario.
- Likewise, the Persimmon Draft Transport Assessment accepts that with the committed development, traffic levels at Weycock Cross will be “extreme and unacceptable” and “over capacity”, yet still concludes the North West Barry site’s impact is “marginal and inconsequential” when taken in the context of the wider RLDP traffic increase. This is a circular argument (*‘more traffic elsewhere means the negative effect of one site is proportionately less significant’*) is patently flawed, and contradicts PPW/Future Wales policy focus on reducing traffic growth and car dependency, not perpetually enlarging junctions.
- TAN 18 and PPW require consideration of cumulative impacts and whether the network is already at or near capacity - the assessments use small percentage increases in traffic load (1.3–3.4% from North West Barry alone) to downplay impact, while ignoring that even small increases can tip an already failing junction into severe congestion.
- Overall, there is a significant risk that the proposed traffic congestion mitigation measures will fail to deliver the necessary benefits, nor will they be delivered before occupation, leaving all residents (new and existing) with years of unacceptable congestion.

Data quality and modelling validity:

- Traffic modelling data is incomplete, inadequately validated, and methodologically inconsistent: for instance, the entire Persimmon Draft Transport Assessment is based on a single day's traffic data in September 2023.

Likewise, the BP14/BP14A Transport Assessments provide no details on how or when data was gathered, questioning the validity and provenance of that data.

- The required North West Barry site signalised access junction has not been assessed cumulatively, leaving a material evidence gap, meaning impact on traffic congestion is likely to be significantly worse than the modelling suggests (while the TA talks about “platooning” and better control, the linked junction modelling indicates that signals inevitably prioritise site traffic while increasing delays on Port Road, rapidly pushing the wider network close to or beyond capacity).

Air Quality Assessments:

- No AQA (air quality assessments) are referenced in **any** of the three TA documents, despite clear congestion and policy triggers. This directly contravenes *PPW12 (Chapter 6)*, *TAN 18* and *Well-being of Future Generations Act* and this alone means the proposed Weycock Cross development is not suitable for inclusion in the RLDP.

Active Travel/sustainable transport:

- Active travel provision in the plan is weak, indicative, and non-compliant with statutory requirements, and does not take into account the inherent location and topology of the site (a long 30-40-minute uphill walking route from nearest train station).
- The Deposit plan states that land at North West Barry has “bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry” yet it fails to mention that none of the bus services provide a meaningful way of getting anywhere useful for those commuting to a place of work. For example, bus service B2 runs hourly starting at 09.42 and ending its service at 15.52.
- Likewise, **no** existing bus services connect Weycock Cross with Barry train station at **any** times of day. Whilst developers can promise up front to fund additional bus services in future, this is not guaranteed, and public finances will not be able to make up the gap. How is this suitable for anyone, let alone people commuting to and from work?
- The Draft Transport Assessment does not really test whether this greenfield, edge-of-Barry site can genuinely support a sustainable pattern of trips (frequency, quality and directness of bus, walk and cycle links to key destinations, particularly the commuter hub of Barry train station). It jumps quickly from trip rates to junction modelling; PPW and TAN 18 expect a

sequential approach: location and accessibility first, then network impacts—especially for greenfield housing that risks locking in car-based travel patterns and dependency.

How can it be claimed that I have been consulted on this critical issue when there are so many gaps and clear anomalies in the strategic transport assessment information that I am required to consider?