

Vale of Glamorgan Deposit Replacement Local Development Plan Public Consultation

Local resident RLDP consultation feedback based on review of RLDP information and supporting documents as hosted on RLDP website <https://valeofglamorgan.oc2.uk/>

Site : HG1 KS1 North West Barry (Weycock Cross)

Objection

**Topic: RLDP Strategic Transport Assessments:
 BP14/BP14A/KS1 Draft TA (Asbri)
 Data-Based Objection**

Ref: NWB_RLDP_JVN_008

Submitted by: [REDACTED]

Date: 10th March 2026

Ref: NWB RLDP JVN 008: RLDP public consultation feedback (Data-Based Objection) on the three key strategic transport assessments provided within the RLDP consultation portal.

This RLDP consultation feedback (objection letter) focuses on several key areas of contradiction between the following documents with current transport planning policy (PPW, TAN18 etc).

- **BP14 Strategic Transport Assessment – Stage 1** RLDP “Supporting Documents” (Nov 23)
- **BP14A Strategic Transport Assessment – Stage 2** RLDP “Supporting Documents” (Dec 25)
- **Draft Transport Assessment KS1** “Supporting Information” Persimmon Homes/Asbri transport report (May 25)

This objection focuses specifically on the full strategic transport picture across all three STAs listed above which were available for public review on the RLDP website, highlighting the following concerns:

Weycock Cross congestion, the NWB signalised access, Active Travel provision, the quality and reliability of traffic modelling inputs, and the absence of air-quality assessment data.

1. Severe and Quantified Congestion Impacts at Weycock Cross Roundabout (J16)

1.1 Baseline and Future Operation (BP14/BP14A Findings):

BP14A shows that **Weycock Cross is already operating close to capacity** (even without accounting for proposed strategic housing):

- **Base RFC = 0.88 in both AM and PM peaks** → “nearing practical capacity..”

When RLDP traffic, including the North West Barry (NWB) site, is added:

- **RLDP RFC rises to 1.02 (AM)** → **over capacity = uncontrolled queueing at peak times**
- **RLDP RFC rises to 0.97 (PM)** → **very close to failure**
- Junction delay **doubles** in both peaks, indicating **unstable operation** and significant queueing..

1.2 Strategic Modelling Impacts (BP14A – SEWTM) and selective use of the TAN18 5% threshold:

SEWTM modelling (Technical Note 05) identifies **significant percentage increases** in total traffic flows at Weycock Cross resulting from RLDP strategic growth:

- **+7.2% AM**
- **+12.2% PM**

These exceed the **TAN18 threshold** for requiring detailed modelling.

- The Draft Transport Assessment (TA) criticises other TAs for not modelling arms with >5% impact (quoting TAN 18 Annex E), but then uses low percentage increases (1.3–3.4%) to argue its own impact is negligible, despite RFCs >1.0 and acknowledged severe congestion.
- That is internally inconsistent with the focus of TAN 18, which explicitly notes that where capacity is or nearly exceeded, even smaller increases are normally material

1.3 Conclusion – congestion modelling:

The Council’s own BP14A Stage 2 evidence directly contradicts the Draft Transport Assessment (Persimmon Homes) and demonstrates that NWB **materially worsens congestion in all directions** at the area’s most constrained junction.

The BP14/BP14A and Draft TA documents all downplay cumulative impact while acknowledging severe future congestion

The Persimmon Draft TA accepts that with committed development, Weycock Cross will be “extreme and unacceptable” and “over capacity”, yet still concludes the site’s impact is “marginal and inconsequential”.

TAN 18 and PPW require consideration of cumulative impacts and whether the network is already at or near capacity—small percentage increases can still be material where junctions are stressed

2. Impact of Proposed Signalised Access for NWB on the A4226

2.1 Proposed signalised junction

The Draft Transport Assessment (Persimmon Homes):

- Proposes a signalised junction
- Provides **no network or corridor-wide analysis**
- Provides **no LinSig modelling**
- Does **not demonstrate compliance** with the Welsh Government Roads Review (which limits new capacity for general traffic)

2.2 Modelling Uncertainty and Omission (BP14A)

BP14A states that the **interaction between the NWB access junction and Weycock Cross has not been assessed within the TN06 modelling**, because the applicant has not yet provided a full junction design or modelling package. This omission introduces a **significant gap** in the cumulative assessment.

2.3 Expected Operational Effects

A new signalised access on A4226 would:

- Introduce a **new stopline** on the corridor already under heavy peak pressure.
- Increase **stop–start conditions**, which worsens emissions (see Section 6).
- Alter flow profiles entering Weycock Cross, likely **exacerbating queues** on the A4226 eastbound and westbound arms.

Given that Weycock Cross is already **over capacity**, any upstream signalisation will further degrade performance.

Conclusion: The NWB access junction has **not been assessed cumulatively**, and the omission likely leads to **material underestimation of network impacts**.

3. Active Travel: Provision Limited, Non-Compliant, and Not Evidence-Based

3.1 BP14A Requirements

Mitigation schemes must promote active travel in accordance with:

- Active Travel (Wales) Act 2013
- Wales Transport Strategy 2021

BP14A includes **indicative** active travel elements in mitigation layouts (e.g., crossings, shared-use links) but fails to provide any detail.

3.2 Weaknesses and Uncertainty Identified in BP14A

BP14A explicitly states that:

- Schemes are **indicative only**
- Subject to further design and land acquisition
- Dependent on funding and developer contributions

There is **no guarantee** that these facilities will be provided, or that they will be delivered **before** occupation. In addition, the Weycock Cross site is in a location which is a steep uphill 30-40 minute walk from the nearest train station, meaning any Active Travel measures which are intended to mitigate the site-generated traffic will have little (if any) impact on commuting traffic increase.

3.3 Applicant TA Fails to Provide Active Travel ATAG-Compliant Evidence

The Persimmon Draft TA includes:

- No **Active Travel Audit**
- No **ATAG compliance assessment**
- No detailed geometric designs
- No crossing delay analysis, desire-line mapping, or route continuity assessment

This makes it **impossible** to demonstrate compliance with Active Travel statutory duties.

4. Quality, Reliability and Limitations of Modelling Data

4.1 Poor quality base data used as the basis for the Draft Transport Assessment (Persimmon Homes)

The Draft Transport Assessment (Persimmon Homes):

- Uses **one day** of turning counts (12 Sept 2023, 07:00–19:00)
- Uses **pro-rata trip assignment**
- No weekend or seasonal data
- TEMPro-only growth
- Does **not** include SEWTM routing
- Does **not model cumulative RLDP-wide impacts**

This does **not** satisfy modern Welsh transport appraisal requirements.

This results in a **systematic underestimation of all movements at the junction**.

4.2 Uncertain quality of base data used as the basis for the BP14/BP14A

BP14 and BP14A **provide no details on how/when or where** the base data for the reports was gathered. This significantly reduces confidence in the outcomes and conclusions of those reports.

4.3 BP14A – Identified Limitations in SEWTM Outputs

BP14A states:

- SEWTM has **limited local validation** in the Vale
- Some junctions are only **partially represented**
- Traffic assignment may use **minor links unrealistically**
- The model includes **no modal shift, demand suppression, or peak spreading**
- Results should be interpreted **with caution** due to missing local constraints

These limitations lead to an **under-prediction of congestion**.

4.4 Data Sources Used in BP14A

- SEWTM 2022 base year data
- Supplementary traffic surveys for some junctions
- Factoring using **TEMPro growth**

However, key surveys for Weycock Cross came from other developments (e.g., Readers Way TA)

5. Cumulative Impacts and Risk of Infrastructure Lag

5.1 BP14A Mitigation Costs

Mitigation measures are proposed at three junctions totals **£5.2 million**, with **£3.8m to be funded via developer S106 contributions**. NWB is apportioned **£410,835 at Weycock Cross**.

5.2 Delivery Risks

BP14A states that:

- Mitigation schemes are **not yet designed**,
- Claimed benefits from modelling data are not robust
- **Not funded in full**,
- Require **land, design, statutory consultation**, and
- May not be delivered **before development is occupied**.

Note: Persimmon Homes, the North West Barry site developer, have a track record of failing to deliver on promised S106 highway improvement measures at other sites, in some cases resulting in legal enforcement action for years after building work has been completed.

Therefore, there is a **high risk of significant congestion long before mitigation is operational**.

6. Air Quality: No Reference to any Assessments Carried Out (Major Omission)

6.1 BP14, BP14A and Persimmon Draft TA

None of the three documents include any reference to an **Air Quality Assessment (AQA)**.

6.2 Conflict with Policy Requirements

Under:

- PPW12 (Chapter 6)
- TAN 18
- Well-being of Future Generations Act

An AQA is required where development:

- Increases traffic,
- Worsens congestion,
- Increases stop–start conditions,
- Produces emissions at sensitive receptors.

BP14A shows:

- Weycock Cross → AM over-capacity, PM near-capacity
- J22 → +13.6% AM / +18.3% PM traffic increase
- Even with best-case mitigation measures → stop–start conditions remain

Thus, the **absence of any AQA for the proposed Weycock Cross development is a fundamental evidence gap which means the proposed Weycock Cross development is not suitable for inclusion in the RLDP.**

Overall Conclusion

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 evidence demonstrates that:

- **Weycock Cross will operate over capacity because of the cumulative development, even if only North West Barry is considered.** BP14A explicitly shows failure in the 2036 RLDP scenario. The assessments use small percentage increases (1.3–3.4%) to downplay impact, while ignoring that even small increases can tip an already failing junction into severe congestion.
- **The North West Barry signalised access junction has not been assessed cumulatively, leaving a material evidence gap,** meaning impact on traffic congestion is likely to be even worse than the modelling suggests.
- **Active travel provision in the plan is weak, indicative, and non-compliant with statutory requirements,** and does not take into account the location and topology of the site (long uphill route from nearest train station, etc)

- **Traffic modelling data is incomplete, inadequately validated, and methodologically inconsistent.** The Persimmon Draft Traffic Assessment is based on a single day's data in September 2023. Likewise, BP14/BP14A provide no details on how or when data was gathered.
- **No air quality assessments are referenced in any of the three documents, despite clear congestion and policy triggers.** This directly contravenes *PPW12 (Chapter 6)*, *TAN 18* and *Well-being of Future Generations Act* and this means the proposed Weycock Cross development is not suitable for inclusion in the RLDP.
- **There is a significant risk that traffic congestion mitigation will not be delivered before occupation, leaving users with years of unacceptable congestion.**

When all the above concerns are taken into account, this constitutes a **robust, evidence-backed basis for objection**.