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: *T23.135.TA.D2.Modelling Addendum Rev A*
Title: 'North West Barry Development Transport Assessment – Modelling Addendum'
(Asbri Transport, for Persimmon Homes)
Displayed on OC2 website KS1 as: "Draft Transport Assessment"
Filename on same: "Draft TA with Appendices_Redacted.pdf"

Ref: NWB_RLDP_JVN_009

Submitted by: [redacted]

Date: 10th March 2026

<u>Ref: NWB_RLDP_JVN_009:</u> RLDP public consultation feedback on '*North West Barry Transport Assessment – Modelling Addendum (May 2025)*' *(KS1 'Supporting Information' Persimmon Homes/Asbritransport report)*

<u>This RLDP consultation feedback focuses on key areas of contradiction between this document with current transport planning policy (PPW, TAN18 etc).</u>

1. Overall approach: capacity-first, car-first

- **Contradiction: focus on junction capacity, not demand reduction or modal shift**
  The Draft Transport Assessment is almost entirely framed around ratio of flow to capacity (RFC)/degree of saturation (DoS), queues and "spare capacity" at Weycock Cross, with success defined as accommodating extra car trips and "marginal and inconsequential impact" on delay. PPW and TAN 18 require integration of land use and transport to *reduce the need to travel by car*, prioritise sustainable modes, and use demand management rather than simply expanding capacity.

- **Contradiction: treating congestion as a problem to be 'engineered away'**
  The document repeatedly treats existing congestion as something to be relieved by extra lanes, slip roads and signalisation, rather than asking whether additional car-based development at this location is compatible with decarbonisation and modal shift objectives. PPW/Future Wales emphasise reducing traffic growth and car dependency, not perpetually enlarging junctions.

2. Treatment of cumulative impact and "inconsequential" language

- **Contradiction: downplaying cumulative impact while acknowledging severe future congestion**
  The 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 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.

- **Selective use of the 5% threshold**
  The Draft Transport Assessment 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's internally inconsistent with the spirit of TAN 18, which explicitly notes that where capacity is or nearly exceeded, even smaller increases are normally material.

3. Junction "enhancements" vs policy on induced traffic and placemaking

- **Contradiction: proposing extra capacity (slip lanes, longer lanes, bypass) as primary mitigation**
  The Draft Transport Assessment's main mitigation is more road capacity: extended left-turn lanes, a free-flow left slip, and signalised junction to facilitate safe site access. PPW

and TAN 18 stress that engineering new road capacity with the sole aim of reducing congestion can **induce** traffic and is generally contrary to sustainable transport and climate objectives.

- **No real engagement with placemaking or severance**
  There is no discussion of how a free-flow slip and extra lanes affect pedestrian/cycle severance, crossing quality, safety, noise, or place function at Weycock Cross, despite PPW's placemaking and "healthier places" requirements.

4. Active Travel: treated as an add-on, not a structuring principle

- **Contradiction: Active Travel framed as a by-product of a signalised access**
  The Draft Transport Assessment presents "dedicated demand dependent green time for pedestrians and cyclists" at the new signals and a link to the proposed Active Travel route as a benefit, but only as an adjunct to a junction designed primarily for motor traffic. The Active Travel (Wales) Act and PPW require that walking and cycling are *prioritised* in scheme design, with high-quality, coherent routes and minimal delay—not simply accommodated within a car-optimised junction.

5. Location and land use integration

- **Tension with accessibility and car-dependence tests**
  The Draft Transport Assessment does not really test whether this greenfield, edge-of-Barry site can support a genuinely sustainable pattern of trips (frequency, quality and directness of bus, walk and cycle links to key destinations). It jumps quickly from trip rates to junction modelling.

  The North West Barry site's location and arduous uphill topology prohibit any chance of serious uptake of Active Travel commuting (on foot or by bicycle) from the nearest commuter hub train station.

  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 patterns. The site patently fails in this regard.

6. Impact on Air Quality and noise levels due to traffic congestion

North West Barry Transport Assessment – Modelling Addendum (May 2025) — there are **zero references** to:

- Air quality
- Air pollution
- NO_2 / nitrogen dioxide
- $PM_{2.5}$ / PM_{10}
- AQMA / Air Quality Management Area
- Environmental impacts of traffic

- Health impacts of emissions
- Noise impact of traffic
- Air quality assessment requirements

There is **no section**, **no paragraph**, and **not even a passing mention** of an air quality assessment being undertaken or even considered anywhere in the document provided.

Why this absence matters (policy context)

This omission is highly significant because:

i) PPW (Planning Policy Wales) requires air quality to be assessed, and impacts considered, as part of the strategic traffic assessment process:

"*For specific proposals, particularly those generating significant traffic, AQA **must** be included **as part of the transport assessment** to assess impacts on, and in conjunction with, the surrounding transport network"*

Even if AQA's *have* previously been undertaken as part of the local council's statutory activity, the lack of inclusion of any AQA data in the report is a glaring failure of the provided RLDP STA data to comply with PPW requirements.

ii) TAN 18 (Transport) explicitly links traffic growth to air quality impacts

Especially at congested junctions — and Weycock Cross is repeatedly described as congested or over capacity.

iii) Future Wales and the Wales Transport Strategy prioritise reducing emissions

Any development generating additional car trips must demonstrate how it avoids worsening air quality.

iv) The site is adjacent to a major arterial route (A4226) with peak-hour congestion

Congested, slow-moving traffic is the worst-case scenario for NO_2 and PM emissions.

v) The Draft Transport Assessment repeatedly proposes capacity-increasing measures

But never evaluates whether these:

- **Increase** induced traffic
- **Increase** emissions and pollution
- **Increase** noise and disturbance
- Affect local receptors (homes, school routes, pedestrians, cyclists)

7. Conclusions:

For the reasons outlined above, I believe it is clear that the not only is the North West Barry KS1 site unsuitable for inclusion in the RLDP based on sustainable travel criteria alone, but also the RLDP supporting evidence in the form of this 3rd party document does not meet the expected standards required by PPW.