

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: **KS1: Heritage**

Ref: NWB_RLDP_JVN_004

Submitted by: 

Date: 10th March 2026

HG1 KS1: Heritage

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I object to the inclusion of land at North West Barry (HG1 KS1) within the RLDP on the basis that the Heritage Assessment commissioned by Persimmon Homes (June 2025) is inadequate, methodologically unsound, and non-compliant with national policy requirements. As such, it cannot be relied upon as evidence to justify allocation of this land for development.

1. Non-Compliance with Planning Policy Wales (PPW) Edition 12 (2024)

1.1 Failure to Assess Significance of Assets

PPW Edition 12 requires planning authorities to protect, conserve, and enhance the historic environment as part of creating “Distinctive and Natural Places”. Heritage assets—designated or non-designated—must be assessed in terms of their *significance* and the *impact* of proposed development on that significance.

The developer’s assessment fails to meet these requirements. It:

- relies almost exclusively on distance and visibility, rather than the holistic considerations mandated by PPW
- does not identify the significance of each potentially affected heritage asset
- does not explain how the proposed development would affect that significance

This approach is materially below the standard required for plan-making.

1.2 Absence of Cumulative or Incremental Impact Assessment

PPW requires a long-term, sustainable approach to placemaking, including the prevention of gradual landscape erosion. The assessment:

- ignores previous encroachment on the rural setting of Barry
- fails to consider whether further development contributes to incremental loss of historic landscape
- uses past erosion as justification for further erosion, in stark contradiction to placemaking principles in PPW

This omission is a significant policy failure.

2. Non-Compliance with Cadw’s “Setting of Historic Assets in Wales” Guidance

2.1 Failure to Apply the Required Four-Stage Methodology

Cadw requires a structured four-stage methodology:

1. Identify the asset
2. Define and analyse its setting

3. Assess the impact of change
4. Consider mitigation

The developer's assessment does not follow this methodology. There is:

- no setting analysis
- no asset-specific impact evaluation
- no discussion of mitigation
- no documented methodology

2.2 Incorrect and Narrow Definition of Setting

Cadw defines setting as the surroundings in which an asset is understood, experienced, and appreciated. This includes tranquillity, remoteness, historic relationships, topography, and other experiential qualities—not merely intervisibility.

The assessment is inconsistent with this definition. It:

- treats “no intervisibility” as equivalent to “no impact”
- disregards experiential qualities such as rural tranquillity and historic context
- fails to acknowledge that setting can be harmed even without direct views

3. Lack of Asset-Specific Evaluation

There are listed buildings within approximately 350–420 metres (e.g., Cwm Ciddy Farm) and several other designated heritage assets within 1–2 km, including Registered Historic Parks, Scheduled Monuments, Gardens and Conservation Areas.

However, the assessment:

- merely lists these assets without analysing their setting or sensitivity
- provides no evaluation of how suburban expansion may alter their rural historic context
- fails to recognise the role of surrounding fields in forming the historic approach to Barry and Porthkerry

Cadw requires each asset's setting to be analysed individually, supported by evidence. This has not been undertaken.

4. Unsubstantiated Dismissal of 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 distinctive historic character, whether designated or not
- Cadw confirms that setting impacts apply to all historic assets

The assessment provides no justification for disregarding this historic character.

5. Insufficient Evidence for LDP Allocation

Cadw states that developers must provide “sufficient, but proportionate information” to allow authorities to assess impacts. The assessment fails this test. It contains:

- no photomontages
- no setting diagrams
- no significance analysis
- conclusions unsupported by evidence

This is inadequate for LDP allocation and fails PPW’s requirement for a robust evidence base.

6. Risk of Partiality

While it is standard practice for developers to commission their own heritage assessments, PPW and Cadw expect such assessments to be balanced, transparent, and methodologically sound. Given the clear departures from national guidance, the LPA must exercise caution in relying on an assessment commissioned by a party with a vested interest in minimising constraints.

Conclusion

The heritage assessment:

- does not comply with PPW Edition 12
- does not comply with Cadw’s *Setting of Historic Assets in Wales*
- does not provide 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 assessment does **not** meet the tests of **soundness** and **cannot** justify removal of this land from the Green Wedge **or** its allocation for development within the RLDP.