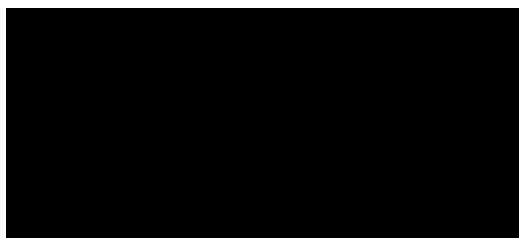


11th March 2026

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Dear Vale of Glamorgan Council

Ref: Objection to RLDP and Site Ref: HG1 KS2 – Dawn Burns

Please find below my objections to the RLDP and Site Ref: HG1 KS2 – the proposed development of 250 homes in Eastbrook, Dinas Powys Vale of Glamorgan (Ref:444).

It is framed specifically for Welsh Planning Practice, TAN guidance, Welsh Government Policy and Fire and Rescue Expectations in Wales.

Additional Objections of; Hard Constraints not being adhered to, the suppression of Reporting on Dinas Powys Flooding in the RLDP, Policy Conflicts and Contradictions, Increased levels of traffic and pollution, Failure to identify the protected and endangered wildlife species evident within the proposed development area, and the increase of additional Patients to adversely affect and impact the quality of NHS services within our community.

Should you have any queries, or wish to discuss any of the points further, please do not hesitate to contact me.

My objections are as follows:

1. Objection: Requirement for Two Accesses for Developments Over 100 Dwellings (Wales)

1.1 Summary Position

The proposed development exceeds 100 dwellings yet relies on a **single point of access** to the public highway.

In the Welsh context, this is **not acceptable**.

While no single statute sets a numeric threshold, the combined weight of:

- **Planning Policy Wales (PPW11)**
- **TAN 18: Transport**
- **Welsh Fire & Rescue Service operational requirements**

- **Manual for Streets (as adopted in Wales)**
- **Local Highway Authority practice across Welsh authorities**
- **Appeal precedent in Wales and England**

creates a **clear and compelling expectation** that large residential schemes must provide **two independent access points**, or at minimum a **fully engineered emergency-only secondary route**.

The proposal fails to meet that expectation and therefore presents an **unacceptable risk to life, property, and network resilience**, contrary to national policy and good practice.

1.2 Planning Policy Wales (PPW11): Network Resilience and Safety

PPW11 places **network safety and resilience** at the heart of transport planning.

Key principles include:

- **PPW11 §4.1.9** – development must ensure “safe, efficient and reliable” access.
- **PPW11 §4.1.31** – transport infrastructure must be “resilient to disruption”.
- **PPW11 §4.1.52** – planning must support emergency access and avoid creating unsafe environments.

A single access serving over 100 dwellings is **inherently non-resilient**.

If blocked by:

- a collision,
- a fallen tree,
- flooding,
- a utilities failure,
- or even routine roadworks,

the entire estate becomes **inaccessible to emergency services**, directly undermining PPW’s requirement for **resilient, safe access**.

1.3 TAN 18: Transport – Safe Access and Emergency Provision

TAN 18 does not set a numeric threshold, but it is explicit that:

- **Access must be safe for all users at all times.**
- **Emergency access must be maintained under all foreseeable conditions.**
- **Layouts must avoid single points of failure.**

TAN 18 repeatedly emphasizes the need for **robust access arrangements** and the avoidance of designs that compromise emergency response.

A single access serving a large population is the textbook example of a **single point of failure**.

1.4 Welsh Fire & Rescue Service Requirements

Fire & Rescue Services in Wales (South Wales, Mid & West Wales, and North Wales) consistently advise that:

- **Large residential developments should not rely on a single access.**
- **A secondary access or emergency-only route is required** where more than ~100 dwellings are served.
- **Blocked access routes are a critical risk factor** in fire fatalities and delayed response times.

This is grounded in:

- **The Fire and Rescue Services Act 2004** (duty to respond effectively).
- **Approved Document B** (access for fire appliances).
- **BS 9991** (resilient access for residential developments).

In practice, Welsh fire authorities routinely object to single-access schemes above 100 dwellings unless a **fully engineered, unobstructed emergency route** is provided.

1.5 Manual for Streets (MfS) – adopted in Wales stresses

- **Network permeability**
- **Avoiding cul-de-sacs serving large populations**
- **Ensuring emergency access under all conditions**

MfS does not set a numeric threshold, but its design philosophy is clear:
Large developments must not depend on a single access point.

1.6 Local Highway Authority Practice Across Wales

Across Welsh LPAs, the working norm is:

- **Up to ~100 dwellings** – single access may be acceptable if geometry is excellent.
- **100–150 dwellings** – strong justification required; emergency access normally mandated.
- **150+ dwellings** – two accesses are expected as standard.

Authorities including:

- **Vale of Glamorgan**
- **Cardiff**
- **Rhondda Cynon Taf**
- **Carmarthenshire**
- **Flintshire**

all routinely require **two accesses or a dedicated emergency route** for schemes of this scale.

This reflects **risk-based practice** and **lessons learned from blocked-access incidents**.

1.7 Appeal Decisions: Consistent Support for Two Accesses

Inspectors have repeatedly upheld refusals where:

- A single access serves **>100–150 dwellings**, and
- No secondary emergency route is provided.

Key themes in appeal reasoning include:

- **Unacceptable risk to life and property**
- **Failure to ensure resilient access**
- **Conflict with national policy on safe and reliable transport networks**
- **Over-reliance on a single vulnerable point of access**

Conversely, appeals succeed only where:

- A **fully engineered emergency-only link** is provided, or
- The dwelling count is significantly lower.

The proposed development falls squarely into the **high-risk category**.

1.8 Risk Assessment: Why a Single Access is Unacceptable

A single access serving over 100 homes creates:

1. Life-safety risk

Emergency services may be unable to reach residents during:

- fires,
- medical emergencies,
- flooding,
- or road obstructions.

2. Evacuation risk

Residents may be unable to leave during:

- fire events,
- gas leaks,
- or environmental hazards.

3. Infrastructure vulnerability

One incident can isolate the entire estate.

4. Policy conflict

Fails PPW11, TAN 18, and the Fire & Rescue Services Act duty to maintain effective response capability.

1.9 Conclusion

The proposal's reliance on a **single access** for a development of 250 dwellings is:

- **Contrary to PPW11** (safe, resilient access)
- **Contrary to TAN 18** (avoid single points of failure)
- **Contrary to Fire & Rescue operational requirements in Wales**
- **Contrary to Manual for Streets principles**
- **Contrary to established Welsh LHA practice**
- **Unsupported by appeal precedent**

The development therefore presents an **unacceptable and avoidable risk** to residents and emergency responders.

A **second access**, or at minimum a **fully engineered emergency-only route**, is **essential** to make the scheme safe and policy-compliant.

2. Objection: Hard Constraints have not been Adhered To

2.1 Highways says that Persimmon cannot pencil in the 'secondary' or 'emergency' access. Persimmon Failed to Do a Traffic Study to Contest Highways View.

2.2 There is no Proposal to bring pedestrian or cycle access up to Welsh Government Standards.

2.3 The Proposed George's Row and Seel Park routes to Eastbrook Station and Camms Corner shops do not work.

2.4 The highway adjacent to the site and providing ingress and egress to any homes built there is on the most congested road within the Vale of Glamorgan. As such it is deemed as traffic sensitive under the terms of the New Roads and Street Works Act 1991. Any planned development is clearly contradictory to both the spirit and the intention of the legislation.

2.4 Risk Assessment: Why Failure to Provide this Information is Unacceptable

The highway proposal for this scheme is deemed as traffic sensitive under the terms of the New Roads and Street Works Act 1991. Any planned development is clearly contradictory to both the spirit and the intention of the legislation.

Highways' objections have not been met, particularly around Active Travel and transport requirements. Highways documents state the Active Travel and busm improvements must be provided. Persimmon has not agreed to these.

Persimmon's assessment shows walking and cycling routes fail to meet required width standards, and alternative routes via Seel Park or alleys are unsuitable.

Connections to Eastbrook Station are considered not feasible due to limited road space for Active Travel-compliance designs.

Cardiff Road is too narrow for safe Active Travel access; southern access options are also unfeasible without major property purchase/demolition.

Policy requires public transport improvements, but Persimmon proposes no new bus infrastructure, and their designs do not accommodate proper bus stops.

Highways advise that the above points are a Welsh Government Requirement for all new developments. This information has not been provided. The RLDP Team need to answer these hard constraints as well as report on amending the draft, prior to any approval.

3. Objection: JBA Consulting Suppressed Dinas Powys Flooding in the RLDP Documents (Wales)

3.1 Risk Assessment: Why Failure to Report this Information is Unacceptable

Their Strategic Flooding Assessment (SFCA) had to record details of historical flood events, yet omitted the Dec. 2020 flooding of 100 homes in Dinas Powys. This same company (JBA Consulting), wrote its Section 19 legal report in 2021. Their SFCA just mentions that the flooding measures dealt with the problem – yet their 2021 report:

Recommends that NRW assess viability of options to manage the flood risk across Dinas Powys; for DCWW to assess the viability of offline storage for the Cae'r Odyn surface water system.

There appears to be a cover up of these measures that have been clearly ignored. On their map, located on the last page of the SFCA, that proposes woodland planting to hold-back rainstorm run-off, on part of the proposed Persimmon's Eastbrook site. The map is only indicative giving no source for the data. A full survey is still required.

The reports that are provided, need to be accurate, honest, transparent and compliant with legislation and policy. This is not. A full survey needs to take place to establish the full potential for flooding measures within Dinas Powys and the proposed Eastbrook Development Site.

4. Objection: Policy Conflicts and Contradictions

4.1 Policy Conflict: Fails PPW11, TAN 18, and the Fire and Rescue Services Act – A duty to maintain effective response capability.

4.2 The proposal's reliance on a single access for a development of 250 dwellings is Contradictory:

- Contrary to PPW11 (safe, resilient access)
- Contrary to TAN 18 (avoid single points of failure)
- Contrary to Fire and Rescue Operational Requirements in Wales
- Contrary to Manual for Streets principles
- Contrary to established Welsh LHA practice
- Unsupported by appeal precedent

The development therefore presents an unacceptable and avoidable risk to residents and emergency responders.

A second access, or at minimum, a fully engineered emergency only route, is essential to make the scheme safe and policy compliant.

4.3 The Welsh Government has placed a physical and ideological moratorium on the building of new roads, an example of this is the blocking of a by-pass around Dinas Powys:

The proposed plans show the building of roads on the proposed development to serve the new residents. This is clearly contradictory to the stated aims and rules imposed by the Welsh Government

5. Objection: Additional

5.1 Unacceptable Increased Levels of Traffic on Cardiff Road Resulting in Increased Air Pollution:

With the proposal of 250 plus, additional dwellings, assuming a minimum of two car each house hold, that is an increase of a minimum of 500 cars (although many households have 3 cars, 1 each plus a works vehicle), that will require access onto Cardiff Road and produce increased air pollution. This is unacceptable. For the Local Authority appointed consultant to advise that there is an unlikely increase in pollution levels is both implausible and raises issues of competence, and integrity and should be questioned further.

5.2 Failure to Undertake the Appropriate Environmental Studies, at the Relevant Times of the Year to Assist in Identifying the Protected and Endangered Species Evident within the Proposed Development Area:

In light of the Environment (Principles, Governance and Biodiversity) Wales Bills, passed by the Senedd on 24th February 2026, it is now even more clearly unacceptable that this plan does not establish legally binding biodiversity targets. The new Office of Environmental Governance is established to hold public bodies to account. The landmark legislation is explicitly framed as a response to the nature and climate emergencies and is intended to halt and reverse biodiversity and decline in Wales. Proceeding with the allocation of HG1 KS2 Eastbrook – destroying a functioning green wedge and wildlife habitat without clear evidence of biodiversity enhancement – directly contradicts the spirit and intent of this new law and the wider duties under the Environment (Wales) Act 2016.

These protected and endangered species present in Eastbrook include:

- **Hazel Dormice:** These are found in the woodlands and hedgerows adjacent to the Eastbrook fields. There is no visible hazel dormouse survey provided.
- **Otters:** Evidence of otters, which are protected, have been recorded in the vicinity of the Eastbrook. There is no visible otter survey provided.
- **Bats:** Various species of bats, which are protected, use the area as a habitat, as well as for foraging and commuting. There is no visible bat survey provided.
- **Badgers:** These are present and are protected, given the suitable habitat. There is no visible badger survey provided.
- **Kingfishers:** These protected bird species are noted in the area. There is no visible kingfisher survey provided.
- **The High Brown Fritillary Butterfly:** one of the UK's most threatened species, is found in the fields of Eastbrook, as well as throughout the Vale of Glamorgan. There is no visible High Brown Fritillary Butterfly survey provided.
- **Gold Crested Newts:** endangered and protected, have been identified in the fields. There is no visible newt survey provided.

5.2.1 Summary:

This proposed development area, known as greenfield sites in Eastbrook, Dinas Powys, serve as a vital habitat and corridor for this wildlife.

Appropriate environmental and ecological studies, surveys and reports need to be carried out, at the relevant times of the year, specifically focusing on the above noted and sited endangered species, in and around this proposed development area. These surveys need to be made visible and provided within the RLDP and HG1 KS2 Eastbrook documentation.

5.3 Additional Patients to Adversely Impact Current and Existing Quality of Services and Resources.

Our schools, GP surgeries and emergency services are already overstretched. Adding hundreds of new residents with committed, funded infrastructure will make life harder for everyone who already lives here. This undermines the ‘A More Equal Wales’ and ‘A Healthier Wales’ goals of the Well-being of Future Generations Act 2015, and fails the RLDP tests of soundness on effectiveness and deliverability.

The likelihood of an excess of 500 new patients being registered at the Dinas Powys Medical Centre will further impact and degrade the quality of services afforded to local residents, which are already far below standards prescribed by the Welsh Government.

6. Conclusion:

This development would clearly have a substantial negative and adverse impact on the residents and wildlife of our local community, and is completely contradictory to any Local Authority or Welsh Government stated aim to protect or even improve the community in which we live.

It is also contradictory the stated commitment to nature, climate, land and biodiversity. The LA and Welsh Government declared a nature emergency in 2019 and then again in 2021, and this proposed development, as well as the lack of genuine and actual reporting regarding the endangered and protected species of wildlife, is in complete contradiction to this. (7 Key Site Supporting Information >KS2 Land North of Dinas Powys>Green Infrastructure Statements).

For all of these reasons, the permanent loss of green wedge space, the unresolved safety issues, the flood risk, the failure to protect and enhance biodiversity, the lack of supporting infrastructure, the catastrophic increase in traffic and pollution and the general harm to our community’s health and well-being, I strongly object to HG1 KS2 Eastbrook.

Whilst the need for further housing is not in dispute, this is the wrong site as clearly outlined above and the consequences would be irreversible. Please remove HG1 KS2 Eastbrook from the RLDP with immediate effect.

Furthermore, as determined by the Welsh Government (A More Equal Wales: mapping guide, 2025), the use of relevant tools and standards such as:

The EHRC Measurement Framework, National Indicators for Wales and EHRC is Wales Fairer? 2018 Report, The National Participation Standards for Children and Young People, The Future Generations Commission Involvement Journey Tool, the 5 Principles of Co-Production, outline the requirements of the Public Sector Equality Duty Specific Duties, in relation to engagement and consultation, to identify where a public body can have the greatest impact in reducing

inequalities of outcome, minimizing disadvantage, but also to inform equality and well-being objectives. There was no evidence of these being utilized, visible or provided.

The Welsh Government further recommends the use of EHRC Public Sector Equality Duty Guide, the Future Generations Report Chapter 4, and the Future Generations Report 2020 'A More Equal Wales,' section for both engagement of local stakeholders and for the setting of objectives. Again, the use of these was not evidenced, visible or provided.

The Welsh Government further emphasizes the consideration of the Well-being Future Generations (Wales) Act 2015 ways of working in particular 'Integration' to identify how a public body's actions impact all of their objectives as well as the objectives of other nearby public bodies and Public Service Boards. There was no evidence of this being considered or that the Future Generations Framework was utilised.

The Welsh Government further advises, under 'Engagement, Involvement and Consultation' that public bodies need to:

- 'listen to, and work with members of their communities which will enhance decision making resulting in better outcomes for all.'
- '...to facilitate the active participation of stakeholders in an open and ongoing dialogue...'
- 'Apply the sustainable development principle and the five ways of working, including involving people with an interest in achieving the Well-being goals.'

I would ask, where is the evidence that all the above listed frameworks, guidelines, legislation, policies, have been considered, implemented and adhered to?

These guidelines, standards, frameworks, policies and legislation, as well as engagement, and involvement of local residents living within the communities affected, are all matters that should be taken into account and followed prior to matters going out for consultation and prior to any decision being made, and should not be used as a hindsight, reflective practice, as appears to be the current accepted practice.

I would urge the Councilors within the Vale of Glamorgan Local Authority to abandon this proposed development plan while they are still in a position of authority to do so. I would further urge the elected Councilors to be mindful of the fact that myself and my fellow residents will judge their actions on this, and other, matters, when next having the opportunity to vote on local elections. Honesty, openness, transparency, as well as perceived competence, adhering to (and not ignoring or contradicting) policy and legislation, as well as listening to the voice of the people (that the Vale of Glamorgan Council serve), and protecting and preserving environment as well as the health and well-being of the people, animals and wildlife that all reside within the Vale of Glamorgan, will all be assessed and measured.

I would be grateful for confirmation that my objections have been formally received and noted.

I would also be grateful for a formal reply in respect to my previous objections, as I never received a reply in respect to the Cosmeston Nature Reserve and Aqua Park objections, despite Mr Goldsworthy advising that he would respond to the questions that I raised, after the meeting in November 2025. To date, I have not received a formal response to that matter, so I am requesting a response in respect to this matter.

I trust that the Vale of Glamorgan Council will now withdraw the RLDP and abandon this proposed development plan for Eastbrook, Dinas Powys, until such time as the appropriate and accurate reports are obtained, surveys carried out properly and within appropriate seasonal timescales, as well as the aims, commitments, policy and legislation of both Welsh Government and the Local Authority are not contradicted and the current levels of traffic on Cardiff Road may be addressed, prior to making the existing problem even worse.

I thank you for your consideration in this matter and look forward to hearing from you in due course.

Kind Regards

Dawn Burns MSc HRM (Hons)