

**Vale of Glamorgan RLDP Deposit Plan Representations & Candidate
Site Submission**

Land at Culverhouse Cross (Candidate Site CS387)

Proposed Allocation for Affordable-Led Residential Development



March 2026

Document Produced by:	Date
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1. Introduction

This representation is submitted on behalf of Powells as land promoters of Candidate Site CS387 at Culverhouse Cross. The representation seeks to set out our comments on the RLDP draft deposit as well as set forward the case for the allocation of the site within the Vale of Glamorgan Replacement Local Development Plan (RLDP) for residential development of up to 50 dwellings, including a minimum of 50% affordable housing.

The site presents a deliverable, sustainable and policy-aligned opportunity to address significant affordable housing need within the Wenvoe housing market area. Despite Culverhouse Cross being identified as a Primary Settlement within the RLDP settlement hierarchy, the Deposit Plan does not allocate any residential development within the settlement.

This approach results in a number of fundamental inconsistencies within the Plan including:

- A settlement hierarchy that identifies Culverhouse Cross as a Primary Settlement but provides no growth.
- Evidence of significant affordable housing need within the Wenvoe ward that is not spatially addressed.
- Policy mechanisms intended to support affordable housing delivery (HG4 and HG5) that cannot realistically operate due to Green Wedge constraints.
- A spatial strategy that places disproportionate emphasis on rail-based settlements despite national policy promoting a wider placemaking-led approach to sustainability.

The representation therefore demonstrates that the RLDP is unsound in respect of Culverhouse Cross and that Candidate Site CS387 represents a sustainable and deliverable allocation capable of addressing identified housing need.

2. Settlement Hierarchy and Spatial Strategy

2.1 Primary Settlement Status

The Deposit RLDP identifies Culverhouse Cross as a **Primary Settlement outside the Strategic Growth Area** within the settlement hierarchy. Under Policy SP2, Primary Settlements represent the highest tier of settlement outside the strategic growth corridor and are identified as locations capable of accommodating **limited but proportionate levels of development**, reflecting their relative accessibility, services, employment opportunities and role within the wider settlement network.

In spatial planning terms, the identification of a settlement as a Primary Settlement carries clear strategic implications. It indicates that the settlement performs an important functional role within the authority and that it represents one of the most sustainable locations for accommodating development outside the Strategic Growth Area. The hierarchy therefore provides the principal framework through which the Plan distributes housing growth across the authority.

However, despite this designation, the RLDP allocates **no housing growth whatsoever within Culverhouse Cross**.

This creates a clear inconsistency between the settlement hierarchy and the spatial distribution of development. If a settlement is identified within the hierarchy as capable of supporting development, the development plan should logically identify opportunities through which that growth can occur. The absence of any allocations, windfall capacity or clearly defined delivery mechanisms means that the designation has no practical effect within the spatial strategy.

In technical planning terms this weakens the internal coherence of the Plan. The Development Plans Manual requires that the spatial strategy and settlement hierarchy operate as a clear and consistent framework guiding the distribution of development. Where a hierarchy identifies settlements as sustainable locations for growth but the Plan subsequently provides no mechanism for that growth to occur, the hierarchy risks becoming descriptive rather than operational.

In the case of Culverhouse Cross, the RLDP acknowledges the settlement's role within the hierarchy but does not translate that role into spatial planning outcomes. The settlement was identified as a Primary Settlement largely due to its functional role as a significant retail, employment and transport hub, together with the recent residential redevelopment of the former ITV studios which has increased its residential function. Whilst the Council appears to treat this redevelopment as a one-off brownfield opportunity that does not justify further greenfield growth, the reality is that the decision to redevelop the site for housing rather than employment has established the principle that residential development is appropriate in this location. When considered alongside the settlement's designation as a Primary Settlement, this demonstrates that the Council itself has already accepted the sustainability of residential growth at Culverhouse Cross. Despite these characteristics, the allocation strategy effectively treats Culverhouse Cross as if it were a settlement where growth is not supported, thereby failing to reflect the very factors that justified its elevation within the settlement hierarchy.

The complete absence of housing allocations at Culverhouse Cross therefore undermines the credibility of the hierarchy and creates an incoherent spatial strategy, particularly where other settlements within the same tier of the hierarchy are expected to accommodate growth. Applying

unequal weight to settlements within the same settlement category introduces inconsistency into the spatial strategy and raises concerns regarding the overall soundness of the Plan.

2.2 Consequences of the Current Approach

The failure to allocate development in Culverhouse Cross has several important consequences for the effectiveness of the Plan.

- **Unmet Local Housing Need** – Local affordable housing needs within the Wenvoe ward are not addressed within the spatial distribution of development. The RLDP therefore fails to demonstrate how identified housing need within this part of the authority will be met.
- **Ineffective Settlement Hierarchy** – The settlement hierarchy fails to operate as a meaningful spatial planning tool. If Primary Settlements are not expected to accommodate any development, the distinction between settlement tiers becomes blurred and the hierarchy ceases to function as a mechanism for directing growth.
- **Displacement of Development Pressure** – Housing demand associated with the eastern Vale is displaced to other settlements rather than being distributed across the settlement network in accordance with the hierarchy. This results in an imbalanced spatial strategy.
- **Loss of Sustainable Small-Scale Opportunities** – Opportunities for small-scale affordable housing delivery in locations close to employment, services and public transport are lost. This is particularly relevant in the case of Culverhouse Cross which functions as a significant employment and retail centre.
- **Policy Mechanisms That Cannot Operate** – The Plan relies on affordable housing exception mechanisms to deliver housing within settlements such as Culverhouse Cross. However, the extent of Green Wedge designation means that these mechanisms cannot realistically function without explicit clarification within the Plan.

Taken together these issues demonstrate that the current spatial strategy does not fully respond to the functional role of Culverhouse Cross within the settlement hierarchy and results in a distribution of development that is neither balanced nor responsive to local housing needs.

3. Affordable Housing Need and Delivery

3.1 Evidence of Need

The Council's own housing evidence demonstrates a substantial requirement for affordable housing across the Vale of Glamorgan, including within rural settlements and the Wenvoe housing market area. The Local Housing Market Assessment identifies a significant backlog of need together with an ongoing annual requirement for additional affordable homes throughout the plan period. Whilst Welsh Government has queried the justification for elevating Culverhouse Cross to Primary Settlement status during the plan preparation process, the available evidence demonstrates that the settlement performs a clear functional role within the eastern Vale. In particular, the settlement benefits from strong bus connectivity to Cardiff and Barry together with established cycle and active travel links, and it sits within a ward where unmet affordable housing need has been clearly identified. When these factors are considered together, they reinforce the rationale for recognising Culverhouse Cross as a sustainable location capable of accommodating proportionate residential growth. This evidence confirms that the need for affordable housing is not confined to the authority's largest settlements but exists across the wider settlement network, including rural wards.

Affordable housing need is particularly acute for smaller one to three bedroom homes, reflecting the changing composition of households and the prevalence of single person and smaller family households. Waiting list data demonstrates significant unmet demand across the authority, particularly for social rented and intermediate homes that are accessible to lower and middle income households.

Within the Wenvoe ward specifically, housing register data identifies a clear need for affordable housing that cannot currently be met through existing supply. This indicates that households with a local connection to the area are unable to access suitable housing within their own community and must either remain in unsuitable accommodation or relocate to other settlements.

Despite this evidence, the RLDP does not allocate any sites capable of delivering affordable housing within Culverhouse Cross or Wenvoe. The absence of allocations means that the Plan does not clearly demonstrate how identified affordable housing needs arising within this part of the authority will be addressed. In spatial planning terms this raises concerns regarding the effectiveness of the Plan, as development plans are expected to respond directly to evidenced housing need and ensure that opportunities for affordable housing delivery are distributed across the settlement hierarchy rather than concentrated solely within a limited number of locations.

3.2 Role of Affordable Housing in the RLDP

The RLDP identifies a requirement to deliver a significant number of affordable homes during the plan period in order to respond to the substantial backlog of need identified within the Local Housing Market Assessment. In practice the Plan relies upon several delivery mechanisms to achieve this target, including:

- Affordable housing contributions secured through Section 106 agreements on market housing sites
- Affordable housing-led allocations delivering a minimum proportion of affordable homes
- Affordable housing exception sites outside settlement boundaries
- Windfall development opportunities that may arise during the plan period

For the overall strategy to be effective, these mechanisms must operate across the settlement hierarchy so that affordable housing delivery is not overly concentrated in a small number of locations. However, in the case of Culverhouse Cross none of these mechanisms realistically provide delivery opportunities. There are no allocated housing sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement significantly constrains the realistic operation of the affordable housing exception site policy. In practical terms this means that, despite clear evidence of unmet affordable housing need within the Wenvoe ward, the RLDP does not identify any credible mechanism through which that need could be addressed locally. This further reinforces the conclusion that the spatial strategy fails to respond effectively to evidenced housing need in this part of the authority.

4. Policy HG4 and HG5 – Practical Deliverability

4.1 Affordable Housing Led Sites (HG4)

Policy HG4 identifies affordable housing-led allocations delivering a minimum of 50% affordable housing.

However these sites are located within settlement boundaries.

At Culverhouse Cross there are no available sites within the settlement boundary capable of delivering such schemes.

As a result HG4 cannot operate as an effective delivery mechanism in this settlement.

4.2 Affordable Housing Exception Sites (HG5)

Policy HG5 allows small-scale affordable housing exception sites outside settlement boundaries where a clear local need is demonstrated.

Culverhouse Cross is specifically identified as a settlement where exception sites may be appropriate.

However the majority of land surrounding the settlement is designated as Green Wedge.

The RLDP does not clearly explain how Policy HG5 should operate where land is also designated as Green Wedge.

This creates a policy ambiguity.

If Green Wedge policy prevents the operation of HG5 entirely, then the policy mechanism identified by the Council for delivering affordable housing in these settlements cannot realistically function.

If HG5 is intended to operate within Green Wedges where the strategic function of the designation is not harmed, then the Plan should make this clear.

Without this clarification the Plan risks creating theoretical delivery mechanisms that cannot be implemented in practice.

5. Green Wedge Considerations

5.1 Purpose of Green Wedges

Green Wedge designations are local planning policy tools used to manage the form of settlements and prevent inappropriate expansion of built development into open countryside. Planning Policy Wales explains that Green Wedges perform a similar function to Green Belts at a local level and are primarily intended to protect the spatial separation between settlements and maintain the distinction between urban areas and the countryside.

Green Wedges are typically designated where there is demonstrable development pressure and where reliance solely on settlement boundaries would not be sufficient to maintain the desired urban form. Their purpose is therefore strategic rather than absolute: they are intended to guide the form and direction of development rather than impose a blanket prohibition on all development.

National policy identifies five principal purposes for Green Wedges:

- Preventing the coalescence of large towns or cities with neighbouring settlements.
- Managing urban form through controlled expansion of urban areas.
- Assisting in safeguarding the countryside from encroachment.
- Protecting the setting of urban areas.
- Assisting urban regeneration by encouraging the recycling of urban land.

Planning Policy Wales also makes clear that Green Wedges should be reviewed as part of the development plan process and should only be retained where there is a demonstrable need for their continued designation.

5.2 Evidence from the Green Wedge Assessment

The Council's own Green Wedge Background Paper (BP27) assesses the land surrounding Culverhouse Cross as part of Green Wedge MG18 (3) – North of Wenvoe. The study divides the designation into a number of parcels (NW1, NW2 and NW3) and assesses their contribution against the five Green Wedge purposes.

Importantly, the assessment demonstrates that land immediately adjoining the urban edge of Culverhouse Cross does not perform a uniformly strong Green Wedge function.

For example, Parcel NW1 – which lies adjacent to the commercial and highway infrastructure associated with Culverhouse Cross – is identified as making only a weak contribution to the purpose of preventing settlement coalescence and a weak contribution to protecting the setting of the urban area, with an overall contribution rating of Moderate.

Similarly, Parcel NW2 – which also lies adjacent to the settlement edge – is assessed as making only a moderate contribution to preventing settlement coalescence and managing urban form, while again making only a weak contribution to protecting the setting of the settlement.

The study explicitly notes that some parcels around Culverhouse Cross do not lie within a gap where coalescence between settlements would occur, and therefore make only a limited contribution to that purpose.

These findings are important because they demonstrate that the Green Wedge designation in this location performs a varied and nuanced role rather than representing land of uniformly high strategic importance.

5.3 Relationship of the Site to the Green Wedge

Candidate Site CS387 occupies a contained position immediately adjacent to the existing urban edge of Culverhouse Cross. In spatial terms the site sits within an area where the Green Wedge assessment identifies only a moderate contribution to the strategic purposes of the designation.

The Green Wedge study also recognises that the retail park, major highway infrastructure and recent residential development at the former ITV studios site exert an urbanising influence on the surrounding land.

Against this context, the development of a small and contained residential scheme adjacent to the settlement boundary would represent a logical rounding-off of the urban edge rather than a significant extension of built form into the wider countryside.

The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge. Landscape buffers and retained open areas would ensure that the remaining Green Wedge continues to fulfil its strategic function.

Importantly, the Green Wedge assessment itself acknowledges that the area around Culverhouse Cross experiences development pressure due to its relatively sustainable location on the western edge of Cardiff and its strong highway accessibility.

In this context, it is necessary for the development plan to strike a balance between protecting the strategic purposes of the Green Wedge and responding to identified housing needs. The limited and carefully contained development proposed at Candidate Site CS387 would achieve this balance by delivering much needed affordable housing while maintaining the wider strategic function of the Green Wedge.

5.4 Implications for the Spatial Strategy

Candidate Site CS387 occupies a contained position adjacent to the existing urban edge of Culverhouse Cross. Green Wedge in this location has been defined as performing a low function in terms of preventing coalescence which is set out within the Councils' own Green Wedge study.

Development of the site would represent a logical rounding-off of the settlement rather than an incursion into open countryside.

The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge.

The development would therefore not undermine the strategic objective of preventing coalescence between Culverhouse Cross and Cardiff.

6. Sustainability of Culverhouse Cross

6.1 Functional Sustainability

Culverhouse Cross functions as a significant employment, retail and service centre within the eastern Vale of Glamorgan and forms one of the principal commercial hubs on the western edge of Cardiff. Although the settlement has historically been characterised primarily by commercial uses, recent residential development has strengthened its role as a mixed-use location where people can live, work and access services within close proximity.

The settlement benefits from a number of key sustainability characteristics which support its role within the settlement hierarchy, including:

- Major retail and employment areas including the Valegate and Culverhouse Cross retail parks which provide a substantial range of jobs and services.
- Frequent bus services linking the settlement with Cardiff, Barry and surrounding communities.
- Access to established active travel routes connecting the settlement with nearby residential areas and employment locations.
- Immediate proximity to strategic highway infrastructure including the A48 and A4232, providing direct connectivity to Cardiff and the wider regional road network.

Taken together, these characteristics mean that Culverhouse Cross operates as a highly accessible location where residents are able to access employment, retail and service opportunities within walking distance or via short public transport journeys. The presence of significant employment uses within the settlement further reduces the need for long-distance commuting and supports the creation of a more self-contained and sustainable community.

Importantly, sustainability within national planning policy is not defined solely by the presence of rail infrastructure but rather by the ability of residents to access services, employment and facilities through a range of transport modes. In this respect Culverhouse Cross performs strongly due to the combination of employment opportunities, public transport connectivity and proximity to Cardiff.

6.2 Alignment with National Policy

National planning policy promotes development in locations where people are able to access jobs, services and community facilities without the need for excessive travel. Planning Policy Wales in particular emphasises the importance of locating new housing in places that support sustainable placemaking outcomes and reduce reliance on private car travel.

Culverhouse Cross clearly meets these criteria. The settlement provides immediate access to employment, retail, healthcare and service facilities together with strong public transport connections into Cardiff and other nearby settlements. This level of accessibility is entirely consistent with the principles of sustainable development promoted through national planning policy.

The absence of a rail station does not in itself render a location unsustainable. Many settlements across Wales function successfully as sustainable communities without direct rail connectivity where other transport options and local services are available.

An approach to spatial planning which places disproportionate emphasis on rail-based settlements risks overlooking locations such as Culverhouse Cross which already function as important employment and service centres within the wider settlement network. A transport

strategy focused solely on rail connectivity fails to recognise the role of bus services, active travel and proximity to employment in supporting sustainable communities.

7. Site Suitability and Deliverability

7.1 Deliverability

The site is available, viable and capable of being delivered within the early years of the Plan period. Importantly, the site does not rely on complex land assembly, strategic infrastructure investment or long lead-in times that often delay the delivery of larger strategic allocations.

Key deliverability characteristics include:

- **Single land ownership** – The site is controlled by a single, motivated landowner working in partnership with an experienced land promoter. This removes the risk of fragmented ownership which can frequently delay the delivery of allocated sites.
- **No abnormal infrastructure requirements** – The site does not require strategic highway works, major utility diversions or significant ground remediation. Development can therefore proceed without the need for substantial upfront infrastructure investment.
- **Existing access arrangements** – The site benefits from an established access point which currently serves the lawful dog-walking business operating on the land. This demonstrates that the site already functions as an accessible and serviced parcel of land and reduces the complexity of future development.
- **Demonstrated viability** – Preliminary development appraisal work indicates that the site can support a scheme delivering approximately 50 dwellings including a minimum of 50% affordable housing while remaining financially viable. This reflects realistic build costs and values within the local housing market.

Taken together, these factors demonstrate that the site represents a **deliverable short-term opportunity** capable of contributing to the Council's housing supply early in the plan period. This is particularly important given the well-recognised need for development plans to allocate sites that can deliver housing quickly rather than relying solely on longer-term strategic sites.

7.2 Development Capacity

The proposed site could deliver approximately **50 dwellings**, including a minimum of **50% affordable housing**, in accordance with the objectives of Policy HG4 and the wider affordable housing strategy within the RLDP.

This scale of development has been carefully considered to ensure that it reflects the role of Culverhouse Cross within the settlement hierarchy while remaining proportionate to the size and character of the settlement. As a Primary Settlement outside the Strategic Growth Area, Culverhouse Cross is identified as a location capable of accommodating limited but meaningful levels of growth that support local housing needs.

A scheme of around 50 homes represents an appropriate and sustainable level of development which would:

- Provide a meaningful contribution towards meeting local affordable housing need within the Wenvoe ward.
- Integrate effectively with the existing built form at the edge of Culverhouse Cross.
- Avoid the need for large-scale urban expansion or major infrastructure investment.
- Maintain the wider strategic function of the surrounding Green Wedge through a contained and well-designed development footprint.

Importantly, the proposed capacity reflects a **small-scale extension to the existing settlement**, rather than a strategic urban expansion. This approach aligns with the spatial strategy for Primary Settlements outside the Strategic Growth Area, where proportionate growth is expected to occur through modest and deliverable sites capable of meeting local needs.

The proposed allocation would therefore represent a logical and sustainable opportunity for residential development that complements the role of Culverhouse Cross within the settlement hierarchy while supporting the delivery of much-needed affordable housing.

8. Soundness of the RLDP

For a development plan to be considered sound it must satisfy the key tests set out within the Development Plans Manual and national planning policy. In summary, a sound plan must be:

- **Justified** – founded on a robust and credible evidence base and representing the most appropriate strategy when considered against reasonable alternatives.
- **Effective** – deliverable over the plan period with clear and realistic mechanisms for implementation.
- **Consistent with national policy** – aligned with the principles and objectives of Planning Policy Wales and the wider framework for sustainable placemaking.

The current RLDP approach to Culverhouse Cross raises significant concerns in relation to each of these tests.

Justified

The Plan identifies Culverhouse Cross as a **Primary Settlement outside the Strategic Growth Area**, recognising its accessibility, employment function and role within the wider settlement network. However, despite this designation, the RLDP allocates **no housing growth whatsoever** within the settlement.

This creates a clear disconnect between the evidence underpinning the settlement hierarchy and the spatial strategy that flows from it. If the evidence base demonstrates that Culverhouse Cross is sufficiently sustainable to be classified as a Primary Settlement, it logically follows that the Plan should provide opportunities for proportionate residential growth within or adjoining the settlement.

The absence of any allocations therefore raises questions as to whether the spatial strategy represents the most appropriate approach when considered against reasonable alternatives. In particular, the Plan does not adequately explain why modest growth opportunities adjacent to the settlement boundary – such as the proposed allocation of Candidate Site CS387 – have been discounted despite their potential to deliver significant levels of affordable housing.

Effective

A development plan must demonstrate that its strategy can be realistically delivered over the plan period. In this case the RLDP relies heavily on a number of policy mechanisms to deliver affordable housing, including market-led allocations, affordable housing-led sites and rural exception sites.

However, these mechanisms are not capable of operating effectively within Culverhouse Cross. There are no allocated sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement severely restricts the realistic operation of affordable housing exception sites.

As a result, although the Plan identifies a clear need for affordable housing within the Wenvoe ward, it fails to identify any credible delivery mechanism through which that need could be addressed locally. This creates a clear risk that the Plan will not deliver the spatial distribution of affordable housing that its evidence base identifies as necessary.

Consistent with National Policy

Planning Policy Wales places strong emphasis on sustainable placemaking and the creation of communities where people are able to access employment, services and facilities without the need for excessive travel. National policy also promotes the efficient use of land and encourages development in locations that already benefit from strong transport connections and established infrastructure.

Culverhouse Cross performs strongly against these principles. The settlement functions as a major retail and employment hub on the western edge of Cardiff and benefits from frequent bus services, active travel links and immediate access to strategic road infrastructure.

The spatial strategy set out in the RLDP does not fully reflect these placemaking principles. By directing growth away from Culverhouse Cross despite its accessibility and service base, the Plan risks overlooking opportunities to deliver sustainable residential development in locations where people can live close to employment and services.

Taken together, these issues demonstrate that the current strategy for Culverhouse Cross is not fully justified by the evidence, cannot be shown to operate effectively in practice, and does not fully reflect the wider objectives of national planning policy. The allocation of Candidate Site CS387 would provide a practical and proportionate means of addressing these shortcomings while supporting the delivery of affordable housing within a sustainable settlement location.

9. Proposed Modification

To address the issues identified throughout this representation it is recommended that the RLDP be modified to allocate **Candidate Site CS387, Land at Culverhouse Cross**, for residential development. The allocation would represent a modest and proportionate extension to the existing settlement boundary and would provide a practical mechanism through which the Plan could respond to clearly identified affordable housing needs within the Wenvoe ward.

The modification would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy while maintaining the strategic purposes of the surrounding Green Wedge designation.

The allocation should provide for:

- **Up to 50 dwellings** delivered as a carefully planned settlement edge scheme which integrates with the existing built form at Culverhouse Cross.
- **A minimum of 50% affordable housing**, ensuring that the development makes a meaningful contribution towards meeting the substantial backlog of affordable housing need identified within the Local Housing Market Assessment and the housing register for the Wenvoe ward.
- **Landscape buffers and retained open space**, designed to maintain visual openness and ensure that the remaining Green Wedge continues to fulfil its strategic function in preventing the coalescence of settlements.

Incorporating this allocation within the RLDP would enable the Plan to:

- **Address locally evidenced housing need** by providing an opportunity to deliver affordable homes within the community where demand has been identified.
- **Support the role of Culverhouse Cross as a Primary Settlement** by allowing proportionate residential growth that reflects the settlement's accessibility, employment base and transport connectivity.
- **Deliver affordable housing in a sustainable location**, close to employment areas, retail services and public transport routes.
- **Provide a deliverable short-term housing site** capable of contributing to housing supply early in the plan period.
- **Maintain the strategic function of the Green Wedge** by focusing development on a contained parcel of land adjacent to the urban edge while retaining substantial areas of open land.
- **Improve the effectiveness and soundness of the RLDP** by ensuring that the spatial strategy properly aligns with the settlement hierarchy and that credible delivery mechanisms exist for affordable housing within this part of the authority.

Alternative Policy Approach

In the event that the Council is not minded to allocate Candidate Site CS387, an alternative and equally effective modification would be to introduce a policy mechanism that allows **affordable housing-led windfall sites within Primary Settlements located in Green Wedge designations**, where it can be clearly demonstrated that development would not undermine the strategic purpose of the Green Wedge.

Such a policy could allow modest residential schemes where:

- the development is **affordable housing-led**, providing a significant proportion of affordable homes;
- the site is **adjacent to the existing settlement boundary** and represents a logical rounding-off of the urban edge;
- it can be demonstrated that the development would **not result in unacceptable coalescence between settlements**;
- the scheme retains sufficient **open land and landscape buffers** to maintain the wider openness of the Green Wedge.

Introducing such a mechanism would provide a practical means of ensuring that affordable housing needs in settlements such as Culverhouse Cross can be addressed without undermining the strategic purpose of the Green Wedge designation. It would also resolve the current policy ambiguity whereby the Plan identifies settlements such as Culverhouse Cross as suitable locations for affordable housing exception sites but does not clearly explain how such sites can come forward where surrounding land lies within the Green Wedge.

This approach would therefore improve the **effectiveness, flexibility and soundness** of the RLDP by ensuring that affordable housing delivery mechanisms can operate in practice across the full settlement hierarchy.

10. Conclusion

Culverhouse Cross represents a sustainable and appropriate location for small-scale residential growth when considered against the evidence base underpinning the RLDP and the wider objectives of national planning policy. The settlement functions as an established employment, retail and service hub on the western edge of Cardiff and benefits from strong public transport connections, active travel links and direct access to strategic highway infrastructure. These characteristics have already been recognised through the Council's decision to designate Culverhouse Cross as a Primary Settlement within the settlement hierarchy.

Despite this designation, the RLDP does not allocate any housing within the settlement and does not identify any credible mechanism through which locally arising housing needs can be addressed. This creates a clear inconsistency within the spatial strategy. A settlement which is recognised as sustainable and capable of accommodating proportionate levels of development cannot logically be treated as a location where no growth is expected to occur.

The absence of allocations also prevents the delivery of much-needed affordable housing within the Wenvoe ward, where the Council's own evidence identifies a clear and persistent backlog of need. Without opportunities for development within or adjoining Culverhouse Cross, households with a local connection to the area are likely to be displaced to other settlements, undermining the objective of creating balanced and inclusive communities across the Vale of Glamorgan.

Candidate Site CS387 provides a deliverable and policy-compliant opportunity to address this issue. The site represents a modest and contained extension to the existing settlement boundary and is capable of delivering approximately 50 dwellings including a minimum of 50% affordable housing. The proposal has been carefully designed to integrate with the existing built form, maintain the wider function of the surrounding Green Wedge and provide a meaningful contribution towards meeting local housing needs.

Allocating the site would therefore provide a practical and proportionate means of improving the effectiveness of the RLDP. It would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy, provide a credible mechanism for delivering affordable housing within this part of the authority and support sustainable placemaking in accordance with national planning policy.

For these reasons it is considered that Candidate Site CS387 should be allocated within the RLDP. Doing so would help ensure that the Plan provides a coherent, deliverable and policy-compliant framework for guiding development across the Vale of Glamorgan over the plan period.

