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Dear Sir / Madam

**Vale of Glamorgan Replacement Local Development Plan 2021-2036
Deposit Plan Consultation – Representation on behalf of Persimmon Homes**

Further to the publication of the Vale of Glamorgan Replacement Local Development Plan (LDP) (2021-2036) Deposit Plan, representations to the Deposit Plan are submitted by Asbri Planning Ltd on behalf of Persimmon Homes. The representations are duly submitted during the statutory Deposit Plan consultation period (by the deadline of 11th March 2026).

We write specifically with regard to the Key Site at 'North West Barry' (Policy SP4: KS1). As the Authority are aware, a significant amount of supporting information has been prepared in relation to the Key Site over the course of the preparation of the Replacement LDP to date – this detailed evidence has clearly demonstrated that the inclusion of 'North West Barry' as a Key Site with the Replacement Plan fully accords with the Replacement LDP strategy. Furthermore, the detailed submissions have evidenced that the site is entirely deliverable and viable.

In summary, this representation sets out support for the inclusion of Land at North West Barry as a Key Site within the Replacement LDP. Our Client (Persimmon Homes) is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive).

We would highlight that although the representation provides overarching support for the Deposit Plan (and the inclusion of North West Barry as a Key Site), a number of detailed objections are submitted in relation to specific elements of the proposed wording of the Key Site policy (HG1: KS1). In addition, the wider policies of the Deposit Plan have been reviewed in detail and comments are submitted accordingly.

Background

By way of background context, as the Authority are aware, a Candidate Site representation was submitted on behalf of Persimmon Homes in relation to Land at Weycock Cross, Barry, at the Stage 1

Call for Sites in September 2022 (Site Ref. 449). The land (circa 7 hectares) was put forward for inclusion in the Replacement LDP for a housing allocation (for circa 180 units). Within the Replacement LDP Preferred Strategy (published November 2023), the Candidate Site at Weycock Cross was not identified as a Key Site, in light of the preferred allocation of 1,500 units at land at North East Barry. Further to issues arising in relation to the deliverability of the North East Barry Key Site, the Authority subsequently consulted on alternative options for the provision of sufficient housing land within Barry, with the Candidate Site at Weycock Cross ('North West Barry') identified as capable of delivering 376 units (as taken forward within the Deposit Plan). A significant degree of supporting survey and assessment work has been prepared in relation to the North West Barry Key Site which serves to demonstrate that the site (at a capacity of 376 units) presents a sustainable, deliverable and viable allocation, capable of accordance with national sustainable placemaking outcomes.

Sustainable Growth Strategy (Policy SP1)

The Deposit Plan's overarching strategy in relation to sustainable growth is supported. The primary focus of concentrating housing growth within the 'Strategic Growth Area' (i.e. where the main centres of population are accommodated, and which are served by a range of facilities and services, and are accessible by a range of transport modes) as outlined by Policy SP1 is considered appropriate and will allow for the delivery of sustainable and resilient communities. As per previous representations submitted by Asbri Planning on behalf of Persimmon Homes in relation to the RLDP Preferred Strategy, the prior identification of the strategic-scale (1,500 unit) Key Site at North East Barry was considered to represent an over-reliance on one site to meet the housing demand of the Authority's Key Settlement (with associated constraints in relation to the delivery of units on a strategic-scale site within the early-mid part of the plan period). It is considered that the inclusion of North West Barry as a Key Site, supplemented by a number of smaller housing allocations as identified in Policy HG1, will ensure that the housing requirement for the Barry can be met in a robust and deliverable manner.

Overall Growth Levels (Policy SP6)

It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate. In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 2024-31st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of Glamorgan. It is stated that: *"Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target"*. In light of the fact that there is a significant shortfall in housing delivery (i.e. currently 27.3% lower than the LDP target), it is considered that a higher growth level for the Replacement Plan period would assist in rectifying under-delivery, allowing for housing completions to be better aligned with evidence of need (rather than repeating past shortfalls).

On February 12th 2026, the Welsh Government published updated estimates of additional housing need in Wales. The figures replace the 2019-based estimates and draw on the latest available data, including the 2022-based household projections published in late 2025. In summary, Welsh Government identify that there is a current estimated existing unmet need of 9,400 housing units. Estimates of existing unmet need have increased by 64% since the 2019-based estimates, due to a rise in homeless households in temporary accommodation.

In terms of future housing need, on average, between 7,800 and 9,300 additional housing units are estimated to be needed annually over the five-year period from July 2025 to June 2030, with a central estimate of 8,700 from newly arising need. The estimated newly arising need for July 2025 to June 2030 is higher than in the 2019-based estimates. This increase reflects higher projected household growth in the 2022-based household projections compared with the 2018-based projections used previously.

The Authority will need to give detailed consideration to the implications of the updated estimates of housing need. As the most up to date projections, the Replacement LDP must properly account for the new dataset to ensure soundness of the plan. In this regard, it is stated at Paragraph 5.34 of the Development Plans Manual that *"In terms of considering the level of housing provision for a plan, the most up-to-date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base."* Accordingly, Paragraph 5.35 goes on to state that *"All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period"*.

In light of the February 2026 publication of updated estimates of housing need in Wales (which indicate a substantial increase in both existing unmet housing need and newly arising need), and in the context of the existing under-delivery of units evidenced within the most recent LDP AMR (i.e. which identifies a shortfall in housing delivery of 27.3% on the adopted LDP target), it is considered essential that the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Policy HG1 KS1 – Land at North West Barry

Overall Support for Allocation

The detailed supporting information prepared on behalf of Persimmon Homes in relation to the Land at North West Barry site to date, including the masterplanning work undertaken in liaison with the Local Authority and their statutory consultees, has demonstrated that a sustainable, high-quality residential development which responds sensitively to both local character and landscape setting can be delivered on the site. It is considered that the allocation of Land at North West Barry (KS1) represents an entirely suitable housing allocation, which has been evidenced as being both viable and deliverable. The inclusion of KS1 as a housing allocation in the Deposit Plan is therefore welcomed and supported.

Policy HG1 KS1 - Detailed Wording - Objections

As stated, although the representations provide overarching support for the Deposit Plan and the inclusion of Land at North West Barry as an allocation, a number of detailed matters are objected to in relation to specific elements of the proposed KS1 policy wording.

It is acknowledged that the Key Site will need to be delivered in accordance with placemaking principles (as set out in Policy SP4 Placemaking and Policy PGD1 Creating Well Designed Places), and

masterplanning work to date has demonstrated that the site is fully capable for compliance with both Policy SP4 and PGD1. Comments are provided on the additional requirements which the site is anticipated to comply with as set out at Policy HG1 KS1. Revised wording where required is identified in red.

- *The provision of a minimum of 113 affordable housing units (30%) with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data. ~~In order to deliver a greater social mix, the affordable units should be dispersed across the site in clusters of no more than 10 units,~~ The positioning of the affordable units will be informed by the experience and best-practice of the Registered Social Landlord responsible for the delivery and ongoing management of the units, with their delivery being phased across the development trajectory.*

The policy as currently worded is considered to be overly prescriptive with regards to the positioning of affordable units on the site. It is the case the Registered Social Landlord who is responsible for the delivery and ongoing operation/management of the affordable units is best-placed to advise upon the positioning of the affordable units within the site layout. As such, it is requested that the prescriptive nature of the above bullet point is amended to allow for the RSL to advise on best practice.

- *Provision of land across the site frontage to allow for the widening of the A4226 Port Road West and the delivery of an Active Travel route across the frontage of the site as part of the Weycock Cross to Cardiff Airport Active Travel route, as identified in Policy TR1 (relating specifically to the delivery of the section of the Active Travel route adjoining the northern boundary of the Key Site only).*
- *Creation of a new signalised junction on to the A4226 Port Road West, which will need to accommodate controlled pedestrian/cycle crossing facilities.*

With regards to the first two bullet points set out under the 'Sustainable Transport and Highways' section of the Policy HG1 KS1 (copied above), to confirm, as part of the development of the Key Site, it is proposed (as detailed within the submitted Transport Assessment) to construct a new junction from Port Road to the west of the Weycock Cross roundabout at the location of the existing field gated access in the form of a signal-controlled junction, which would allow for the safe and timely exit of traffic from the development onto the local highway network. Such an access would also provide enhanced Active Travel infrastructure in conjunction with the proposed Active Travel route between the Weycock Cross junction and Cardiff Airport. Traffic signals at the proposed site access would provide for dedicated demand dependent green time for pedestrians and cyclists along this section of the A4226 Port Road. Significant work has been undertaken to date in demonstrating that the above is deliverable. However, it is requested that further clarification is included within the policy text to confirm that the Key Site is not responsible for the delivery of any further/additional sections of the Weycock Cross to Cardiff Airport Active Travel route, over and above the section of the route which adjoins the Key Site. Suggested additional text is outlined in red above.

- *A proportionate contribution towards off-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).*

As set out within the Transport Assessment (May 2025) prepared in support of the Key Site, the traffic movements associated with the North West Barry allocation could be accommodated on the highway

network with a marginal and inconsequential impact on the conditions already experienced on the local highway network. An appraisal of the impact of committed development (as agreed with the Highways Authority) has been undertaken as part of the Transport Assessment, which identifies that committed development within the vicinity of the Weycock Cross junction would have a greater impact upon the local highway network than the North West Barry Key Site. The North West Barry development is smaller in comparison to the other committed development assessed, and would have a marginal and inconsequential impact upon the operation of the Weycock Cross junction. It is therefore considered that the policy wording should be amended to reflect the 'proportionate' nature of contributions required. Suggested additional text is outlined in red above.

- *A contribution towards off-site sustainable transport measures ~~in the area~~ (as necessary and related to the Key Site).*

Further clarification is required in regards to the above bullet point. It will be important to ensure that any off-site measures are directly related to the proposed development, and are necessary to ensure the acceptability of the proposed development. The requirement for a contribution towards off-site measures 'in the area' is not specific enough, and it is requested that the wording is amended as per the suggested text outlined in red above.

- *The provision of a key area of open space ~~(minimum 2.3 ha)~~ to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to the adjoining SINC at Mill Wood and offer opportunities for significant biodiversity enhancements. The ownership of this area should be transferred to the Vale of Glamorgan Council, ~~together with an appropriate financial contribution,~~ for management as part of Porthkerry Country Park.*

It is considered that the inclusion of a specified figure for the area of open space to be provided within the southern section of the site is unnecessary within the policy text. The Indicative Plan for the Key Site included at Figure 13 of the Deposit Plan illustrates the indicative extent of 'Significant Open Space' to be provided adjoining Porthkerry Country Park, which will be subject to further detailed masterplanning work as the Planning Application is prepared in due course. A figure for the exact area of open space to be provided within this section of the site cannot therefore be robustly specified until the further stages of masterplanning work are completed. As such, it is requested that the figure is removed from the policy text, with the identification of 'Significant Open Space' on Indicative Plan being considered satisfactory. Furthermore, it is not considered appropriate that the policy wording should refer specifically to the financial contribution towards the management of this land, in addition to its transfer, as such contributions will be subject to detailed viability appraisal work at the Planning Application stage.

Deposit Plan Appendix 1 - Housing Trajectory

The identified delivery timescales and quantum of units for the site as set out at Appendix 1 of the Deposit Plan (as copied below) are agreed with and considered to be suitable/deliverable:

2028-2029:	30 units
2029-2030:	60 units
2030-2031:	60 units
2031-2032:	60 units
2032-2033:	60 units
2033-2034:	60 units

2034-2035: 46 units

Persimmon Homes are committed to the delivery of the allocation, in accordance with the phasing trajectory outlined in the Deposit Plan. Further to the detailed submissions previously made, including extensive viability evidence which has been discussed in detail with the Local Authority and their viability consultant, it is confirmed that the site is viable and deliverable in accordance with the identified delivery timescales. It should be noted that there is a possibility that the number of units to be delivered within the first year (2028-2029) could be increased slightly, however, it is considered that the above presents a realistic trajectory for the site.

Deposit Plan Appendix 2 – Infrastructure Delivery Plan

A number of amendments to the text are requested in regard to the infrastructure requirements for KS1 North West Barry as set out within the Infrastructure Delivery Plan at Appendix 2 of the Deposit LDP.

Within the 'Key site issues and constraints' section of the Infrastructure Requirements table, the following amendments to the text are considered necessary:

- *Proportionate access and junction arrangements on to the A4226 and a financial contribution towards strategic highway network enhancements (in the context of the impact of wider committed developments on the strategic highway network).*

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development, and that additional committed developments, which would have a greater impact on the strategic highway network, are considered in the round.

- *Previous desk-based assessment and site visits identified that development would have a major impact on five features (?), including important hedgerows which form historic boundaries. Archaeological features were also identified.*

The above bullet point requires clarification as to the 'five features' which the development would have a 'major impact' upon. It should be noted that masterplanning work to date has been informed by extensive survey and assessment work which ensures that the proposed development is capable of addressing all constraints.

Within the section of the table where 'broad costs' of key infrastructure requirements are outlined, it is considered that the following amendments to the text are necessary:

- *Education – Estimated Cost ~~Circa £3,730,000~~ (£TBC)*

It is considered that an estimated cost for education contributions cannot be specified at this stage, as the contribution will be directly related to current school capacity figures at the time of the Planning Application, with school capacities being fluid and subject to change. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

- *A proportionate contribution towards on-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).*

- VOGC to deliver improvements to junctions on the Strategic Highways Network using s106 contributions *(from the North West Barry Key Site and other relevant commitments)*.

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development.

- Contribution towards off-site sustainable transport measures ~~in the area~~ *as necessary and related to the Key Site.*

As per the wording contained within the policy text of HG1 KS1, the requirement for a contribution towards off-site measures 'in the area' is not specific enough to provide certainty for the developer, and it will be important to ensure that any off-site measures are necessary and directly related to the North West Barry development.

- Community Facilities – Estimated Cost ~~Circa £665,000~~ *(£TBC)*

It is considered that an estimated cost for community facility contributions cannot be specified at this stage – no background calculations are provided to evidence that this estimate is robust. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes has significant concerns regarding Policy CC1 and objects to it on the basis that it replicates requirements already being progressed at a national level through Welsh Government's Future Homes Standard (FHS). The FHS is intended to deliver "zero carbon ready" homes via a unified Building Regulations framework, making additional local policy unnecessary. At present, Building Regulations Part L1A sets out the standards for energy efficiency in new dwellings, and Persimmon already designs its homes to go beyond these minimum thresholds. This includes enhanced insulation and improved building fabric performance, with reduced U values for elements such as walls, roofs, floors and windows to minimise heat loss. As a result, our homes typically achieve strong Energy Performance Certificate (EPC) ratings, generally in the A–B categories.

Introducing further operational net zero requirements at a local planning level risks adding cost, complexity and uncertainty, potentially affecting the viability and deliverability of housing sites. The Development Plans Manual for Wales is clear that local plans should not repeat national policy or seek to regulate matters already addressed through other statutory regimes. On that basis, Policy CC1 is not considered to be justified and is inconsistent with the second test of soundness.

The proposed shift in standards from April 2030 represents a substantial and abrupt escalation in expectations. Although the policy refers to schemes such as Tai ar y Cyd and AECB CarbonLite, these examples largely relate to grant funded affordable housing projects. There is no robust evidence that equivalent standards can be met on mainstream housing sites without undermining overall viability. The Development Plans Manual requires policies to be based on strong evidence and to be realistically deliverable across the plan period. Without this, there is a risk that the proposed policy could impede housing delivery and compromise the RLDP's ability to meet identified needs.

Policy CC1 could also lead to inconsistent energy performance requirements across Local Planning Authorities in Wales, contradicting the advantages of a unified regulatory system via Building Regulations. For volume housebuilders working across several authority areas, this would introduce

unnecessary variation and complication. The DPM highlights the importance of policies that support housing delivery and avoid avoidable burdens. By introducing bespoke modelling thresholds and operational monitoring requirements, CC1 risks blurring the line between planning and Building Control, raising questions about the policy's justification and practical application.

It is Persimmon's view that Policy CC1 is premature and that it is more appropriate for such matters to be addressed through building control rather than planning policy. In its current form, the policy risks impacting housing supply, affordable housing delivery and overall implementation across the plan period. For these reasons, we consider that Policy CC1 fails to satisfy the relevant tests of soundness and should be removed from the emerging RLDP.

Summary

As summarised above, and set out in full detail within the supporting survey/assessment work that has been provided to the Local Authority in relation to the site, the inclusion of Land at North West Barry as a Key Site (Policy HG1: KS1) with the Replacement Plan fully accords with the RLDP strategy. Furthermore, it is considered that (with the inclusion of the site), the Deposit Plan complies with the tests of soundness. Further to ongoing discussions with the Authority, we would reiterate the Site Promoter's commitment to delivering the allocation which has been evidenced as being entirely deliverable and viable

As set out within this representation, overall support is provided for the Deposit Plan (and the inclusion of North West Barry as a Key Site), however, as detailed, objections are submitted in relation to the specific elements of the proposed wording of the Key Site policy (SP4: KS1).

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to take part in the relevant Hearing Sessions (in relation to Policy HG1: KS1, and wider strategic policies as required). Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'C. Blyth'.

Catherine Blyth
Associate Director