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Date Received.....

Date of Acknowledgement

Vale of Glamorgan Replacement Local Development Plan 2021-2036

DEPOSIT PLAN CONSULTATION

Public Consultation Representation Form

The Council is seeking your views on the Replacement Local Development Plan (RLDP) **Deposit Plan**. The Deposit Plan is the next formal stage in the development plan preparation process and expands on the Preferred Strategy which the Council consulted on in December 2023 – February 2024.

The Deposit Plan is the full draft version of the RLDP, detailing the **overall strategy, development policies, land designations** (e.g. conservation) and **specific land allocations** for development (including new housing and employment sites) over the 15-year period 2021-2036.

The public consultation will run for 6 weeks between **Wednesday 28th January 2026 and Wednesday 11th March 2026**. Representations received after this time will not be considered.

Full details of the consultation are available on the Council's website at: www.valeofglamorgan.gov.uk/ldp or by scanning the QR code above.

The Council encourages representations on the Deposit Plan to be made via our **online consultation portal** available at <https://valeofglamorgan.oc2.uk/> however representations submitted using this form will also be accepted.

Representations are welcomed in both Welsh and English and this representation form is available in other formats on request e.g. Welsh, large print.

1: Contact Details

Your / Your Client's Details			Agent's Details (if relevant) *		
Title			Title	Mr	
Name			Name	Jamie Lewis	
Organisation (If applicable)	Persimmon Homes (East Wales)		Organisation (If applicable)	Boyer	
Address	c/o Agent		Address		
Postcode	c/o Agent		Postcode		
Email	c/o Agent		Email		
Telephone No.	c/o Agent		Telephone No.		
Communication preference: (Please tick)	Email	☐	Communication preference: (Please tick)	Email	☒
	Letter	☐		Letter	☐
Language preference: (Please tick)	English	☐	Language preference: (Please tick)	English	☒
	Welsh	☐		Welsh	☐

*If you are acting as an Agent, please also provide details of person/organisation you are representing (Note: you will need to supply a separate form for each person/organisation you are representing).

2: Your Views

QUESTION 1:

What are your thoughts on the Deposit RLDP (e.g. policies, site allocations)?

Please state which site reference, policy or paragraph number your comments refer to. If you are commenting on more than one site, policy or paragraph, please use a separate sheet for each one.

SITE REFERENCE/POLICY/PARAGRAPH NUMBER:

Agree/Support	☐	Disagree/Object	☐	Comment	☒	No Comment	☐
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Comments:

Please refer to the accompanying written representations, submitted on behalf of Persimmon Homes in respect of Proposed Allocation HG1 KS2 - Land North of Dinas Powys, Vale of Glamorgan, CF64 4LL

Please attach additional pages if required.

QUESTION 2: WELSH LANGUAGE

We would like to know your views on the effects that proposals in the Deposit Plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. Do you think that there will be any impacts, either positive or negative? Please explain

Yes	☐	No	☐	Don't know	☐	No Comment	☒
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Comments:

Please attach additional pages if required.

ABOUT YOU

The following questions will help us ensure data is representative of population of the authority and help us to target underrepresented groups. **You are not required to complete this section if you would prefer not to.**

Are you...?		What is your age group?	
Male	☐	Under 16	☐
Female	☐	16 – 24	☐
Other	☐	25 – 44	☐
Prefer not to say	☐	45 – 64	☐
What is your ethnic group?		Aged 65 or over	☐
White	☐	Prefer not to say	☐
Mixed	☐	What is your main language?	
Asian	☐	Welsh	☐
Black	☐	English	☐
Chinese	☐	Bilingual	☐
Prefer not to say	☐	Prefer not to say	☐
Other ethnic group (<i>please state</i>)	☐	Other (including British Sign Language, large print etc.) (<i>please state</i>)	☐
What is your religion or belief?		Do you have a disability?	
Christian (all denominations)	☐	Yes	☐
Buddhist	☐	No	☐
Hindu	☐	Prefer not to say	☐
Jewish	☐	What is your legal marital or same sex civil partnership status?	
Muslim	☐	Single	☐
Sikh	☐	Living with partner	☐
Humanist	☐	Married	☐
No religion or belief	☐	Separated	☐
Prefer not to say	☐	Divorced	☐
Any other religion or belief (<i>please state</i>)	☐	Widowed	☐
		Civil Partnership	☐
What is your sexual orientation?		Dissolved Civil Partnership	☐
Bisexual	☐	Surviving Civil Partnership	☐
Gay	☐	Prefer not to say	☐
Lesbian	☐		
Heterosexual	☐		
Prefer not to say	☐		
Other (<i>please state</i>)	☐		

IMPORTANT INFORMATION

Thank you for your comments. Following the consultation, the Council will consider the responses and prepare a report of consultation, which will form part of the evidence for the Replacement Local Development Plan.

Completed Representation Forms and any supporting information should be returned to the LDP Team:

BY EMAIL – ldp@valeofglamorgan.gov.uk

ONLINE – By completing the electronic form at <https://valeofglamorgan.oc2.uk/>

BY POST – Planning Policy Team, Vale of Glamorgan Council, Civic Offices, Holton Rd, Barry, CF63 4RU

If you require any further information or have any questions, please contact the LDP Team on 01446 704681 or e mail ldp@valeofglamorgan.gov.uk

Submissions are welcome in either Welsh or English and this representation form is available in other formats on request e.g. Welsh, large print.

How we will use your information

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. A paper copy of the Council's Privacy Notice can be provided upon request or can be viewed at: https://www.valeofglamorgan.gov.uk/en/our_council/Website-Privacy-Notice.aspx

Data Protection Notice – Please note that all comments received cannot be treated as confidential and once duly reported and considered, will be available for public inspection. We will also hold your contact details on our Replacement LDP Consultation Database for the duration of the RLDP preparation process which will keep you informed of future updates. If you would like to be removed from the database at any time and no longer wish to receive correspondence from the Council on the RLDP, then this can be requested in writing. However, any information provided will be stored safely and retained in accordance with Vale of Glamorgan Council's data retention policy unless it needs to be retained under another lawful basis.

REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN

23:55 ON WEDNESDAY 11th MARCH 2026

REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Signed:



Date:

11/03/2026



Boyer

11th March 2026
Our Ref: 22.8024

Planning Policy Team,
Vale of Glamorgan Council,
Civic Offices,
Holton Road,
Barry
CF63 4RU



Dear LDP Team,

Vale of Glamorgan Replacement Local Development Plan (2021 – 2036) – Deposit Plan Consultation

Written Representations on behalf of Persimmon Homes

Land North of Dinas Powys, Vale of Glamorgan, CF64 4LL (KS2 - North Dinas Powys)

Boyer are pleased to submit this representation on behalf of our client, Persimmon Homes Ltd (Persimmon), in response to the current consultation regarding the Vale of Glamorgan's (VoG) Replacement Local Development Plan (RLDP) Deposit Plan.

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.

For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.

As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.

Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.



The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020));

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics

Settlement Pattern

In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.

Paragraph 3.9 explains that primary settlements *"offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs"*.

The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need

In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17



confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives

Key Themes

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.

In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.

Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision

In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.

The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.

In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.



Objective 4 – Placemaking

As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

Our site in Dinas Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.

Objective 8 – Promoting Active and Sustainable Travel Choices

Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.

Section 5: Sustainable Growth Strategy

RLDP Sustainable Growth Strategy comprises six key elements as follows:

1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).

In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.

Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the



proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.

Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.

Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.

In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.

From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.

Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.

As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.

Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.



2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.

Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.

Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intention to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.

Table 15: Key and Service Centre Settlements Overall Score:

Settlement	Total Score	Principle 1.1 Public Transport	Principle 1.2 Distance to key Services	Principle 2.1 Key Facilities	Principle 2.2 Daily Facilities	Principle 3 Employment Opportunities	Population
Barry	292	46	18	109	44	55	20
Penarth	229	43	18	86	44	18	20
Llantwit Major	179	24	16	68	36	20	15
Cowbridge	154	7	16	65	36	20	10

Table 16: Primary Settlements Overall Score:

Settlement	Total Score	Principle 1.1 Public Transport	Principle 1.2 Distance to key Services	Principle 2.1 Key Facilities	Principle 2.2 Daily Facilities	Principle 3 Employment Opportunities	Population
Dinas Powys	149	29	18	36	31	20	15
Rhosee	137	18	18	48	25	18	10
St Athan	120	11	18	30	26	25	10
Llandough (Penarth)	117	41	18	15	13	20	10
Sully	81	13	18	15	17	8	10
Wenvoe	61	8	18	5	17	8	5
Wick	59	8	16	5	17	8	5
Culverhouse Cross	57	13	16	0	17	6	5

Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)



3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.

The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.

Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that *"Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car"*. Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.

In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.

Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.

By directing development to locations well served by existing bus and rail infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.

Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable



residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.

In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.

Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.



Figure 10: Key Diagram

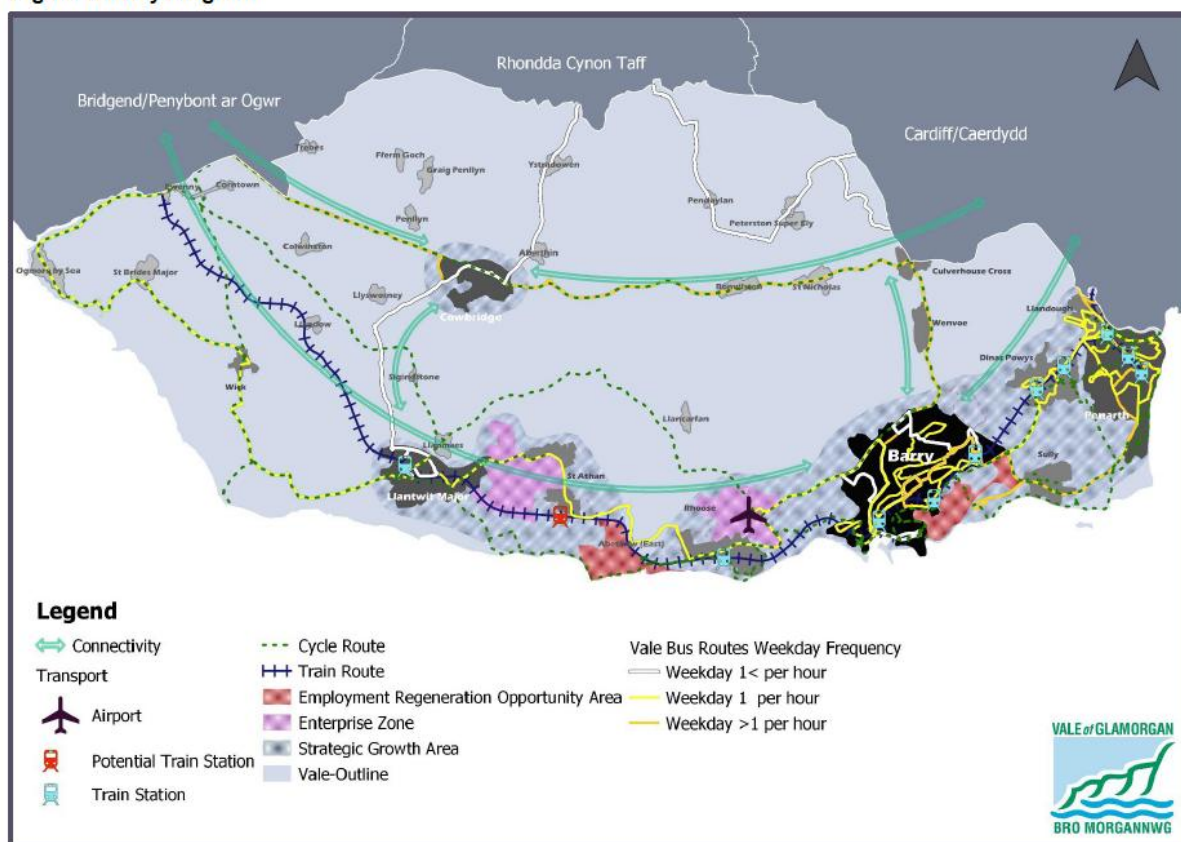


Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan

Section 6: Policy Framework

This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.

Strategic and Spatial Choices (Placemaking)

Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.



Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.

Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.

However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.

This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a



shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.



Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Total household growth over plan period x 1.04 = Total Dwellings Required

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.



Table 2: Housing Supply Components: Housing Supply and Housing Requirement			
	Component of Supply	Number of Dwellings	Notes
A	Completions 21/22 - 24/25	1,747	Comprising 1,562 dwellings on large sites and 185 dwellings on small sites
B	Units under construction 1 st April 2025	313	Comprising Large Sites 10 dwellings >
C	Units within planning permission	1,860	Includes sites that have S106 agreements pending where it is realistic that the agreement will be signed.
D	Non-delivery allowance for land bank	-83	Assumed 5% of units with planning permission where construction has not already commenced (1663 units) will not be delivered based on past delivery rates
	Total Existing Supply (A+B+C-D)	3,837	
E	Large Sites Windfall Allowance (10 or more dwellings)	720	Based on past delivery rates over adopted LDP plan period. To avoid double counting of large windfall sites already within the land supply, this allowance has been discounted from the first 2 years of the land supply and applied to the subsequent 9 remaining years of the plan (80 dwellings x 9 years)
F	Small Sites Windfall Allowance	583	Based on past delivery rates. This allowance has been applied to the remaining 11 years of the plan period (53 dwellings x 11 years)

Table 2: Housing Supply Components: Housing Supply and Housing Requirement			
	Total Windfall allowance (E+F)	1,303	
	RLDP allocations	3,520	Key sites – 2,278 units New housing allocations – 161 units Rolled forward sites – 959 units Affordable housing led sites – 122 units
	Housing Provision	8,660	

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council



must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified *"has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area."* It also notes that this level of growth has been chosen so that it is *"complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR)."*

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to



warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Council's ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.



The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net



hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.

A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.

Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.

The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to



the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Table 1: Thresholds for Health Impact Assessment and Planning for Health Checklist		
DEVELOPMENT TYPE	HEALTHY PLACEMAKING SCREENING CHECKLIST	RAPID HEALTH IMPACT ASSESSMENT
Residential	Between 10 and 99 Dwellings or an Area of 0.5 hectare to 2 hectares	100 Dwellings or greater or greater than 2 hectares
Employment/Other Commercial/Leisure	Built Floor Space of 1,000m ² to 4,000 m ²	Built Floor Space Greater than 4,000 m ²

Table 4. Extract of Proposed Criteria for HIA Assessments

The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.



Active and Social Places

Policy SP6 – Housing Requirements

Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy HG1 – Housing Allocations

HG1 KS2 – Land to the North of Dinas Powys

Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.

The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidence base. These principles align with the Council's aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.

Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.

In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response



to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.

By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

Unsustainable Location & Poor Connectivity

Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.

Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alternative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and



would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.



HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)

Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.

Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.

This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would



further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.

Policy SP7 – Affordable Housing Provision

In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.



Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel



Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insulation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon



Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.



Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development



proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermine the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward.



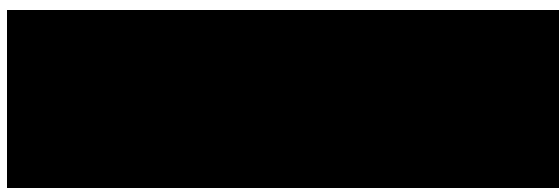
Persimmon Homes' most pertinent comments on the consultation document are summarised below:

- Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
- Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
- Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
- In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
- Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.



- Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
- Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.

Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.



Director

Tel:

