

Land West of Swanbridge Road (Phase 3), Sully

Vale of Glamorgan RLDP 2021-2036: Deposit Plan Consultation

Date of report: March 2026

PREPARED FOR

**Taylor
Wimpey**

savills

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Document History

Issue	Date	Issued by	Comment
1.0	24/02/2026		Draft for review
2.0	10/03/2026		Updated

1. Introduction

- 1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
- 1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.
- 1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.
- 1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:
- Archaeological Desk-based Assessment (prepared by RPS);
 - Design Vision (prepared by Pegasus Group);
 - Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
 - Landscape Appraisal (prepared by Pegasus Group);
 - Preliminary Ecological Appraisal (prepared by Soltys Brewster);
 - High Level Viability Statement (prepared by Savills);
 - Transport Technical Note (prepared by Vectos); and
 - Supporting Statement (prepared by Savills).
- 1.1.5 Since then, and on behalf of Taylor Wimpey, Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.
- 1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.
- 1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment

Introduction

- 2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.
- 2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.
- 2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

- 2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).
- 2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Background Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

- 2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development than sites that the Deposit RLDP proposes to instead allocate.
- 2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.
- 2.1.8 The key conclusions from this Assessment are that:
 - The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;
 - The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;
 - The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

- The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and
- Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

- 2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.
- 2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.
- 2.1.12 A summary of this is presented below:

Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

Score	Initial Integrated Sustainability Appraisal	Taylor Wimpey Suggested Approach
++	3	4
+	4	7
0	0	2
?	3	2
-	3	2
--	4	0

- 2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

- 3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.
- 3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy	Support or Object
SP1 Sustainable Growth Strategy	Object
SP2 Settlement Hierarchy	Support
SP 6 Housing Requirement	Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry	Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston	Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout	Object
CC1 Residential Operational Net Zero Carbon Development	Object
CI1 Open Space Provision	Clarity required
DNP5 Environmental Protection	Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

- 3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant

pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

- 3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

- 3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

- 3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.
- 3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

- 3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).
- 3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.
- 3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.
- 3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth

Land West of Swanbridge Road (Phase 3), Sully

in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

- 3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
- 3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

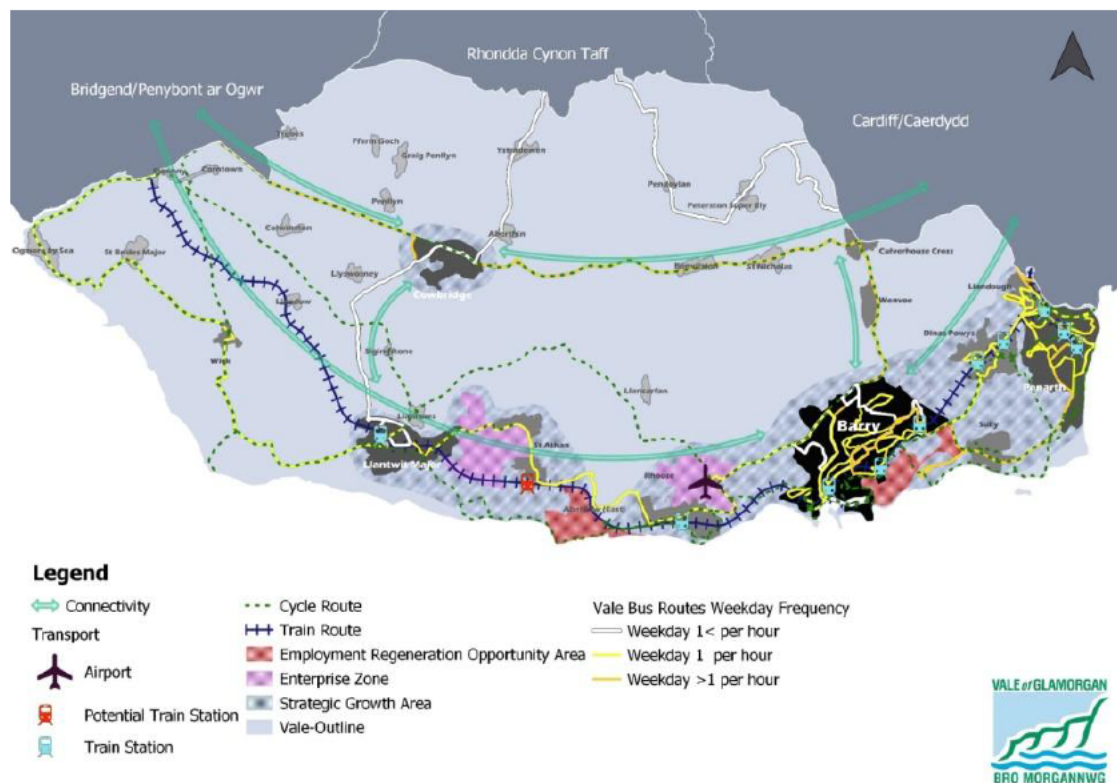


Figure 1 Extract of Growth Strategy

- 3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry,

however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

- 3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.
- 3.3.9 Whilst Draft Policy SP2 presents a '*broad distribution of development within the Strategic Growth Area.*', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.
- 3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

- 3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

- 3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.
- 3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.
- 3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length than 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.
- 3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement

Scenario	Housing Requirement
RLDP	7,587
2018-based projections	6,214
2022-based projections	9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning

permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

- 3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.
- 3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.
- 3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwellings were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.
- 3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.
- 3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

- 3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completions delivered as windfalls.
- 3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.
- 3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

- 3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.
- 3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road. These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

- Viability constraints;
- Site specific constraints;
- Landowner intentions;
- Requirements for SAB approval; and
- Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach

Housing Supply	Deposit Plan (December 2025)	Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement	7,890	9,623
Flexibility Allowance	10%	20%
Flexibility Allowance	770	1,925
Housing Requirement + Flexibility Allowance	8,660	11,548
A – Completions	1,747	1,747
B – Units Under Construction	313	313
C and D- Units with Planning Permission Minus Non-Delivery Allowance	1,777	1,488
Existing Supply	3,827	3,548
E – Large Windfall Sites	720	540
F – Small Windfall Sites	583	438
E+ F Total Windfall Allowance	1,303	978
RLDP Allocations	3,520	3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry

- 3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.
- 3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
- 3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
- 3.3.42 Policy HG1 KS1 proposes to allocate the site known as ‘Land at North West Barry’.
- 3.3.43 The proposed allocation of this site follows a consultation – entitled ‘Housing Growth in Barry’ - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.
- 3.3.44 Taylor Wimpey responded as part of the ‘Housing Growth in Barry’ consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of ‘Land at North West Barry’ as an alternative.
- 3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
- 3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

- 3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey’s suggested scoring which is included as Appendix A.
- 3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

Score	Phase 3 Land West of Swanbridge Road (260 homes) (Site ID 376)		North West Barry (including extension) (375 homes) (Site ID 490)	
	VoG's ISA scoring	TW's suggested ISA scoring	VoG's ISA scoring	TW's suggested ISA scoring
++	3	4	1	0
+	4	7	5	5
0	0	2	0	0
?	3	2	2	2
-	3	2	6	5
--	4	0	3	5

- 3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.
- 3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.
- 3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

- 3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.
- 3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

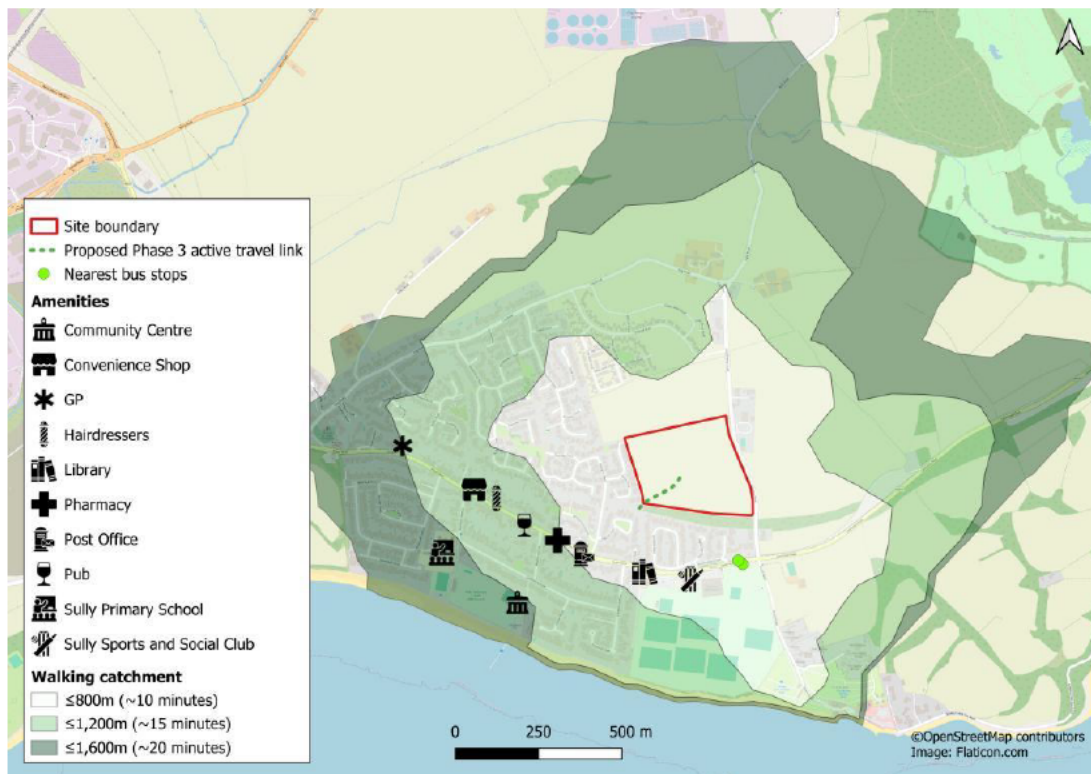


Figure 2 Map of the Site and Existing Local Facilities

- 3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.
- 3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

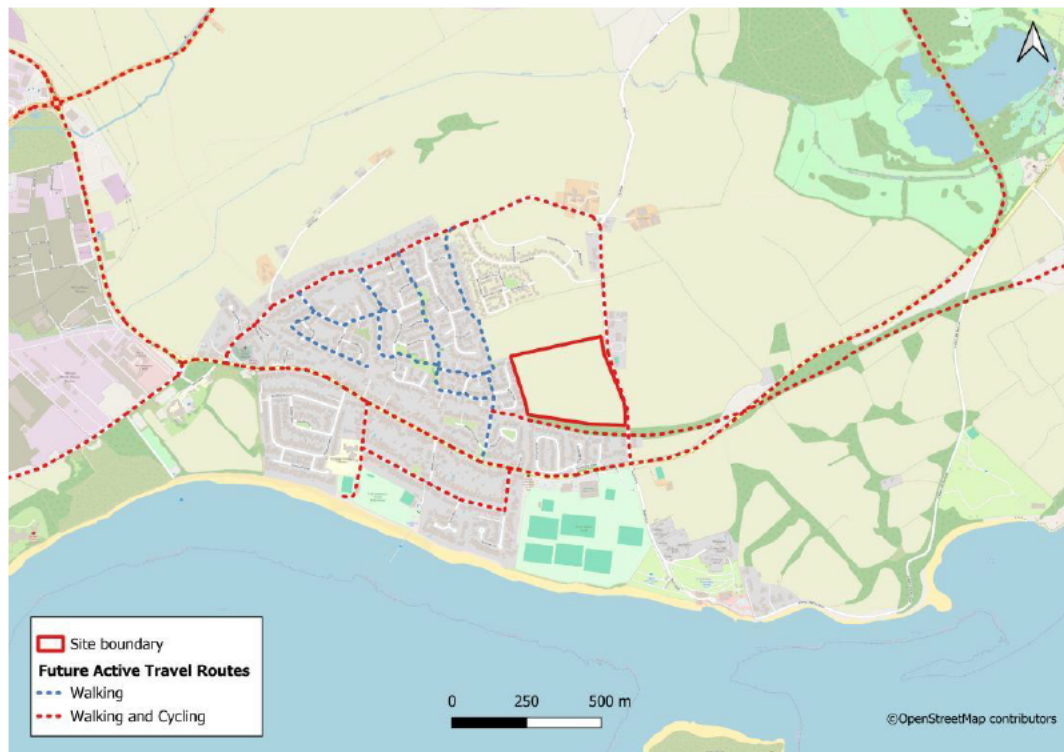


Figure 3 Map of the Site and Future Active Travel Routes

- 3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.
- 3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.
- 3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Land West of Swanbridge Road (Phase 3), Sully

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

Local Facilities	Land North West of Barry (Site Ref. 449)	Land West of Swanbridge Road (Phase 3), Sully (Site Ref. 376)
Bus Stop	300m	450m
Post Office	1.4km	500m
Pharmacy	1.3km	500m
Primary School	1.3km	900m
GP Surgery	1.5km	950m
Sport and Leisure Facilities	1.6km	600m

Key	Walking Distances
	≤ 10 minute / 700m walk
	≤ 15 minute / 1km walk
	> 15 minute / 1km walk

- 3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

- 3.8 Taking the above together, the conclusion Taylor Wimpey reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

- 3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

- 3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

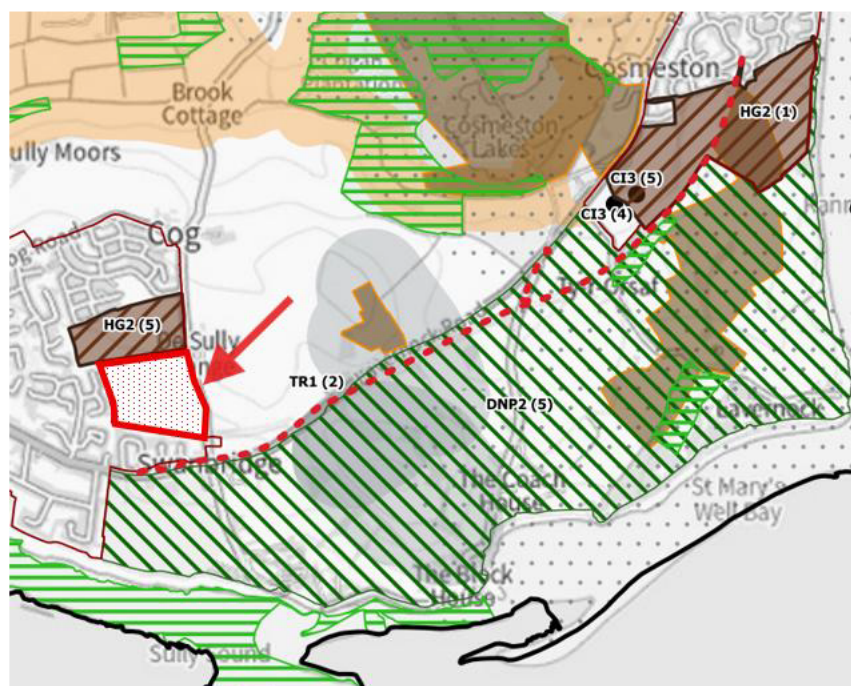


Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

- 3.11 Taylor Wimpey raise concerns around the proposed works at the Weycock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

- 3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
- 3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any

development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

- 3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
- 3.15 There are two points to be made here:
- 3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.
- 3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.
- 3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.
- 3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.
- 3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
- 3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.
- 3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
- 3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.
- 3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient

certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

- 3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
- 3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
- 3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter,

Policy DNP5 Environmental Protection

- 3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.
- 3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.
- 3.30 Whilst Taylor Wimpey support the clause within the draft policy: *"Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes."* However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Appendix A

**Agricultural Assessment prepared by The Andersons
Centre (February 2024)**

ANDERSONS

THE ANDERSONS CENTRE

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AGRICULTURAL ASSESSMENT

for land at

Sully

On behalf of

Taylor Wimpey UK Limited

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

February 2024

JTS/LC

Prepared by

Joe Scarratt

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1. INTRODUCTION

1. I am Joe Scarratt, a Partner and Farm Business Consultant, working for The Andersons Centre, a national organisation of Farm Business Consultants. I have 15 years farm business consultancy experience delivering business and technical advice services to farmers and the supply trade, as well as almost 20 years practical farming/farm management experience. My colleague Kerry Jerman who visited the site is also a Farm Business Consultant with The Andersons Centre and has over 10 years experience working with the firm delivering practical and financial solutions to farming clients as well as running her farming enterprises.
2. This report has been prepared on behalf of Taylor Wimpey UK Limited. This report has been prepared to assess the following:
 - a. The viability of the use of an 8 ha (20 acre) site at Sully, Vale of Glamorgan, for Agriculture
 - b. The current state of the land and its usage/limitations for agriculture
 - c. Assessment of the productivity of the land and average Gross Margins achieved
 - d. The overall impact upon the current occupier's business if the agricultural land in question was lost to housing development.
3. Kerry Jerman visited the site and viewed the land on 19th February 2024.
4. I then had a telephone conversation with the current tenant Edward Thomas, also on 19th February 2024.
5. The area of land currently being considered for development is part of a larger parcel which was understood to be two parcels historically. The total parcel size is circa 15.4 ha (38 acres). This excludes the 3 fields to the North which are currently being developed. For the purpose of this report I have been asked to consider the land that comprises the 8 ha (20 acre) area as outlined red on the attached plan which is the southern part of the 15.4 ha total parcel. The whole area is currently rented by Edward Thomas who farms as part of a family business whose main base is circa 8 miles away. It is understood that Edward is

current tenant and his father and grandfather were tenants of the land before him. The land is part of a 230 acre farm currently rented from the same landlord under an Agricultural Holdings Act tenancy at Sully. The current rent paid is circa £120/acre.

6. Any references throughout this report to specific data in relation to the tenant's business was provided by the tenant themselves, this being Edward Thomas, as provided by a telephone conversation held on 19th February 2024. This information has not been verified by a complete stock audit or any specific farm/financial records.
7. I have also been in contact with Nick Heard of Savills (Town Planners acting on behalf of Taylor Wimpey UK) to verify various items of data and information relating to the site.

2. THE SITE

1. The site extends to 8 ha (20 acres) in total. It is located on the North Eastern side of Sully, Vale of Glamorgan, in South Wales. This land is comprised of part of an existing 38 acre field which is partly outlined red on the attached plan and partly the area to the North. The northern half of this parcel benefits from outline planning permission already. This area of land is understood to be owned by a local Family Trust. The three former fields to the North are already in the process of being developed.
2. It is understood that the land has been rented by the current tenant's family for the previous two generations.
3. The land is accessible off Swanbridge Road. The main access is via double gates in good condition. This access is suitable for modern farm machinery and equipment.
4. The land is bordered by residential housing on the Western side, Northern side (being built now on the former 3 fields and the area between the current development and the 20 acre site considered here now has outline planning permission) and Southern side south of the dis-used railway line.
5. It is understood that there are no public footpaths across the site.

3. THE LAND

1. Using the Agricultural Land Classification map for Wales (1:250,000 Series Map) produced by MAFF, it is evident that the land is Grade 3. A more detailed survey of the land was undertaken by ADAS in October 2012 (as attached in Appendix III). This report reveals that the land is a mixture of Grade 3a and Grade 3b, the majority being Grade 3a. This was further confirmed by a report completed by Kernon Countryside Consultants Ltd in October 2012 (as attached in Appendix IV). Grade 3a land is classified as Best and Most Versatile Agricultural Land. This is land which is more flexible in its agricultural use, most productive and efficient in its response to inputs.
2. The Soil Classification map for the area demonstrates that the land is of the Malham 2 Soil Association (541p). This is Aeolian silty drift over Carboniferous limestone and Triassic limestone breccia. It is described as:-
'Well drained often stoneless silty soils over limestone, shallow in places especially on crests and steep slopes. Bare rock locally.'
3. Kerry viewed the land on 19th February. The field is clearly a good productive block of land. The soils are clearly of a productive and fertile nature. This reflects, and is not unusual for, its Agricultural Land Classification. There was a muck heap present in the field demonstrating the regular improvement and conditioning of the land.
4. The maps indicate suitable uses as:-
'Dairying and stock rearing on permanent grassland, some spring cereals.'
5. The land appears to be relatively free draining with only a small waterlogged area adjacent to the gateway but this not a surprise given a winter of above average rainfall.

6. The land is currently sown with an Italian Ryegrass Ley. The land is in a rotation of Ryegrass (to be cut once early Spring), followed by Forage Maize, followed by Wheat, and then back to a short-term Italian Ryegrass ley. The land is clearly capable of producing a wide range of crops. It looks productive and easy working soil. The grass ley present was very forward for the time of year. The land has been farmed well and well maintained. This is the same for the whole 38 acre parcel, therefore what is present on this 20 acre area is no different to the other half of the field to the north which benefits from planning permission already.
7. The boundaries to the field are made up of mature hedgerows which are well managed. The boundaries adjacent to the houses on the western side are a mixture of fences, hedges and railings. All boundaries appear reasonably secure.
8. The site has no formal farm buildings or other facilities attached to it. It is understood that there is no mains electricity available on the site. The site does not contain any other farm infrastructure or any livestock handling facilities, being solely bare land.
9. There does not appear to be any evidence of any existing problems with trespassers from the nearby housing developments. I discussed this with the tenant who indicated that other than small amounts of garden waste being discarded over fences, there was no major issues with the surrounding housing at present. Historically there had been issues with trespassing and damage to bales for example, but this has since reduced to nil incidences in recent years. This could potentially change with continued development adjacent to the site.

4. THE TENANT AND THE CURRENT FARMING SYSTEM

1. Mr Edward Thomas and family are the current tenants of the land. The rent paid is circa £120/acre which compared to open market Farm Business Tenancy rents is modest; but for an Agricultural Holdings Act tenancy this is at the higher end of typical rents paid.

2. The main farm is based circa 8 miles away meaning there is a fair number of vehicle movements to farm the land. However, this block of land is part of a 230 acre farm rented at Sully acting as a heifer rearing unit for the farm's dairy herd. The main farm enterprise is a 1900 cow dairy operation. The total area farmed by the family is circa 3,000 acres. For the avoidance of doubt, this 20 acre site being considered for development is included within this total farm area. This land therefore comprises a small proportion of the overall total farmed area.
3. Principally, the rotation derived above is used to grow forage for the heifer rearing unit. This is grass for grass silage, forage maize for feeding and the wheat crop would typically be combined but fed to the dairy herd and/or heifers reared as grain to replace purchased concentrate. Occasionally, small amounts of grain may be sold in some years.
4. I was informed that Farm Yard Manure (FYM) is applied to the land, normally each year. This would also include slurry. No artificial P&K based fertilisers are applied to the land as the FYM and slurry is sufficient to meet the demands. Bagged nitrogen and sulphur fertiliser is applied as required. The applications of FYM and slurry will certainly maintain good soil organic matter levels as well as returning valuable P & K nutrients to the land. This is essential where land is being mown and the crop removed; the same also for forage maize. I am informed that P & K indices are good (2s and 3s). In my opinion it is not possible to know the soil indices without undertaking soil tests but clearly they will be sufficient as the productive capacity demonstrates that. It is normally good practise to undertake soil tests every 2-3 years to ensure P & K indices are maintained and soil pH is within target ranges.
5. The land is a key requirement to meet the farm's Water Resources (Control of Agricultural Pollution) (Wales) Regulations at present. I was informed that at present organic manure is exported to meet the current regulatory requirements and as such any reduction in farmed area will require further exports. This would increase machinery / vehicle movements and necessitate the need to find other farmers locally to take such organic manure.
6. The current labour requirement for the current farming activity on the land is defined as follows (refer to John Nix Farm Management Pocketbook, 2023, 53rd Edition):-

Enterprise	Ha	Standard Man Days (SMD) per ha	Total SMD
Silage Ley (one cut)	8	1.6	12.8
Forage Maize	8	1.75	14
Winter Wheat	8	1.75	14
			40.8

N.B. No data for maize so assumed same as cereals.

The farm business has its own family labour, employed labour and occasional use of contractors. Therefore, if the land was lost to development, 0.15 of a full-time labour unit equivalent's work would be lost according to the SMD assumptions which is negligible economically.

7. It is understood that the current tenant owns the Basic Payment Entitlements to the land and claims each year.

5. CURRENT AGRICULTURAL PRODUCTIVITY AND VALUE

1. As stated above, it is understood that the land is currently used to produce forage crops (grass and maize) and wheat in rotation to provide feed for the farm's dairy cows and youngstock. The agricultural use of the land does not appear to be limited to any particular use, being capable of growing cereal crops or grassland. Without more detailed assessment it is difficult to assess what other crops the land would be suitable to producing. However, it is assumed that the land would not be suitable for growing root crops or vegetables.

2. The land can be used effectively for all purposes as it is in good sized enclosures that are suitable for modern machinery.
3. Yields are good. I was informed typical yields would be as follows:-
 - a. Grass ley one early cut at 6t/acre (fresh)
 - b. Maize at 18t/acre
 - c. Wheat combined at 4t/ac plus straw.

These are above average and reflect the productivity of the land. Looking at the fields I can qualify that these are very achievable.

4. Although Edward did provide typical purchase and sale prices of replacement forage, in an attempt to assess the financial impact, standard Gross Margin data from the Agricultural Budgeting and Costing Book (97th Edition, November 2023) has been used, which has been interpreted in line with the combination of farming systems on the land and the likely replacement cost of forage purchased locally. The effect of the loss of this land would not affect the size of the livestock enterprises but it would mean that forage and grain must be replaced with purchases elsewhere from other sites without development potential, thus an opportunity cost. Clearly, more land would be needed for the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 requirement explained above.

Enterprise Gross Margin	£	Notes
Basic Payment	1,080	Estimate at £135/ha (re-distributive element will vary determined by total claim size)
Short-term Grass Ley	2,320	ABC GM with 1/3 fertiliser cost as short-term ley; 6t/ac at £50/t
Maize	16,317	ABC GM with yield at 18t/ac at £60/t
Wheat	9,560	ABC GM with wheat yield adjusted to 4t/ac
Average 2 Year Rotation (£/Year)	15,179	
Less, Overheads		
Labour and Machinery	4,560	£570/ha average for large arable farms (ABC average) *
Rent	2,400	

Total Overheads	6,960	
Net Reduction in Profit	8,219	

** The machinery and labour cost reference has been taken from the arable farm data simply because the growing of the crops on this land is akin to this operation. To deduct the average dairy farm costs on a per ha basis would be mis-leading and inappropriate.*

5. To account for the value of the Basic Payment, we must remember that the entitlements have a capital value. In Wales, these are currently trading at approximately £70/unit. Therefore, there would be a modest capital sum to be received by the farming business for the sale of the entitlements if the land was lost to development.
6. I have assumed a reduction in overheads in proportion to the area of the land lost. This can sometimes be difficult to achieve when a business reduces in size. Nevertheless, the reduction in profit is likely to be a very small percentage of overall farm profitability.
7. I am informed by Edward Thomas that there is little other land available to rent locally to replace the land lost or more importantly to export organic manure to at a sensible distance. However, in my experience the ability to access new tenancy opportunities in any part of Wales or England is a challenge currently due to the profound demand by farmers to grow their businesses.

6. CONCLUSIONS

1. The land is productive and fertile and has achieved good grass and crop yields in recent years.
2. The land is currently down to an Italian ryegrass ley but is cropped in a rotation of short-term (one cut) grass ley, forage maize and wheat.

3. The land benefits from good access, enabling modern machinery to access the land, therefore widening the possible uses. The urban fringe location of the land potentially limits the attractiveness and safety of keeping grazing livestock on the land, although this is not an issue for its current use growing conserved forage and feed for cattle housed elsewhere. Nevertheless, with the likelihood of development up to the northern boundary, increased use of Swanbridge road by residents and more residents generally, there could potentially be future issues farming the land.
4. The area of land that could be lost to development is relatively small as a proportion of the total land area farmed by the business. This can be mitigated by purchasing forage from elsewhere. However, it will of course have a financial impact of doing so, as quantified above. The practical issue that will need resolving is the export of organic manure to other arable farmers or livestock farmers with lower stocking rates to remain compliant with Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 requirements. If this is not possible, then potentially stock numbers may have to reduce. Downward pressure on agricultural profitability is likely to increase as Basic Payment is phased out by 2027, therefore making the profitability of the farming operation alone even more important.
5. If the land were to be made available to be farmed by alternative tenants, it is unlikely that any new tenant would be able to generate much greater profit from the land under the same farming system than the current tenants as it appears to be farmed to a high standard.

APPENDIX I – SITE PLAN

APPENDIX 2 – ADAS REPORT

APPENDIX 3 – KERNON CONSULTANTS REPORT

Appendix B

Integrated Sustainability Appraisal – Assessment of ISA Score Against Taylor Wimpey Suggested Score

Integrated Sustainability Appraisal – Assessment of ISA Score Against Taylor Wimpey Suggested Score

ISA Site Framework Criteria	ISA Score	BDWH Suggested Score	Explanation
3	--	+	A Transport Technical Note prepared by SLR was submitted as part of the Call for sites. This confirms that the site is 770m from Sully Primary School.
5	--	++	The Indicative Framework Plan for the site prepared by Pegasus Group incorporates the provision of a Locally Equipped Area of Play and a Local Area of Play within the subject site's boundaries.
11	--	0	Commentary is provided on matters relating to agricultural land classification in Taylor Wimpey's supporting representation. Taylor Wimpey's position is that, whilst the site contains BMV agricultural land, its loss is unlikely to be significant from a farm business perspective. Any loss needs to be seen in the context of the approach in the Preferred Strategy which would regardless see the loss of substantial areas of BMV agricultural land.
13	?	0	Submitted at Call for Sites stage was a Preliminary Ecological Appraisal prepared by Soltys Brewster. This confirms that, whilst the site is within 1km from designated ecological sites, there would be no significant impact subject to appropriate mitigation and enhancement measures.
14	--	?	The site is in excess of 200m away from the nearest listed buildings which are located at Cog Farm, circa 600m to the north and separated by modern development.
15	?	+	A Landscape Appraisal prepared by Pegasus Group was submitted at Candidate Site stage. The appraisal confirms that the site itself is not subject to any statutory or non-statutory landscape designations. The Appraisal concludes that the site is visually well contained and that any negative effects can be mitigated through the layout of the site and the strategic landscaping approach. The Appraisal highlights the need to retain and strengthen landscaping along the site's boundaries and the proposals for the site do this.
16	-	+	The site is entirely within Flood Zone 1.

Appendix C

Transport Technical Note prepared by SLR Consulting Ltd
(May 2025)



SLRCONSULTING.COM

Land West of Swanbridge Road, Sully

Taylor Wimpey South Wales

May 2025





Phases

- Phase 1
- Phase 2
- Phase 3 (the site)

Active Travel Routes

- Existing PRoW
- Proposed Phase 3 active travel link
- Sully to Cosmeston active travel link
- VoG proposed walking only route
- VoG proposed walking and cycling route

Public Transport Nodes

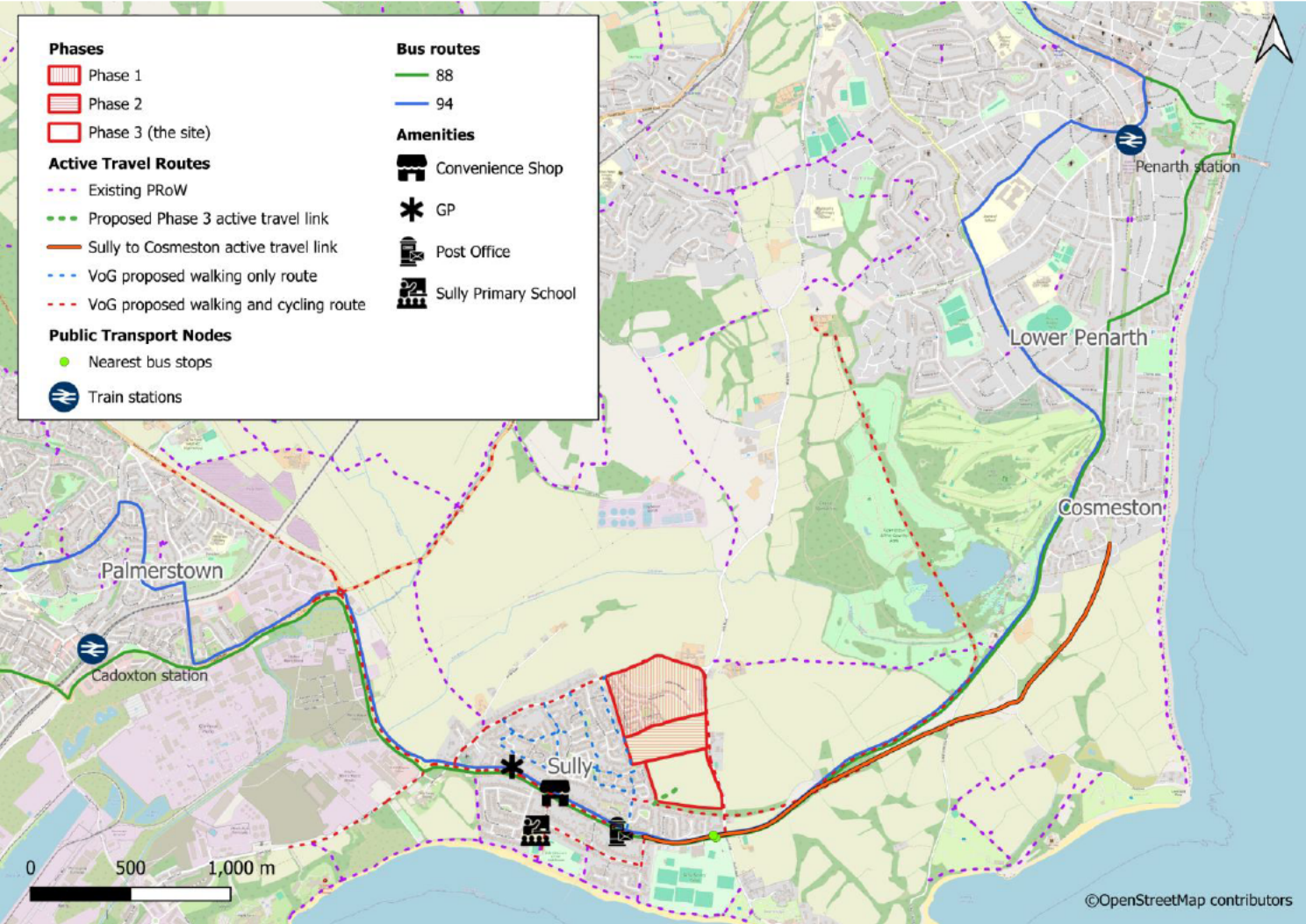
- Nearest bus stops
- Train stations

Bus routes

- 88
- 94

Amenities

- Convenience Shop
- GP
- Post Office
- Sully Primary School



Site and Surrounding Area



Introduction

SLR Consulting Ltd is appointed by Taylor Wimpey PLC to provide additional information in relation to the proposed residential development at Land to the West of Swanbridge Road, Sully (known as *Site 376*).

The site is immediately south of the "Land West of Swanbridge Road, Sully" which is allocated in the LDP 500 homes through Policy MG2(37).

The Land North of the Hedgerow portion benefits from outline planning permission for up to 350 homes (ref. 2013/01279/OUT) with reserved matters subsequently approved for 325 homes (ref. 2019/00111/RES). The Land South of the Hedgerow part of the site will be the second phase of the allocated site. Outline planning permission was granted for up to 190 homes (ref. 2016/01520/OUT) in August 2022.

This document sets out the sustainability credentials of the site. It highlights the vision for the site and provides a detailed overview of existing and future active travel and public transport infrastructure.

The VOG Replacement Local Development Plan (RLDP) Preferred Strategy, identified five key sites for allocation, including one site located to the North East of Barry. As confirmed in a VOG Cabinet meeting on 01/05/2025, there are currently deliverability issues at the site to the North East of Barry and it would not therefore be appropriate to allocate it as part the Deposit Plan.

It is proposed that Land to the West of Swanbridge Road, Sully is a suitable alternative site to assist the VOG in its housing delivery and, from a sustainability and accessibility perspective, it performs better than West of Barry (known as Site 449) which is identified as the alternative to North East Barry.

The following topics are covered in this document:

- Existing Accessibility;
- Future Accessibility;
- The South Wales Metro and the Sully to Cosmeston Route; and
- Comparisons with other sites.



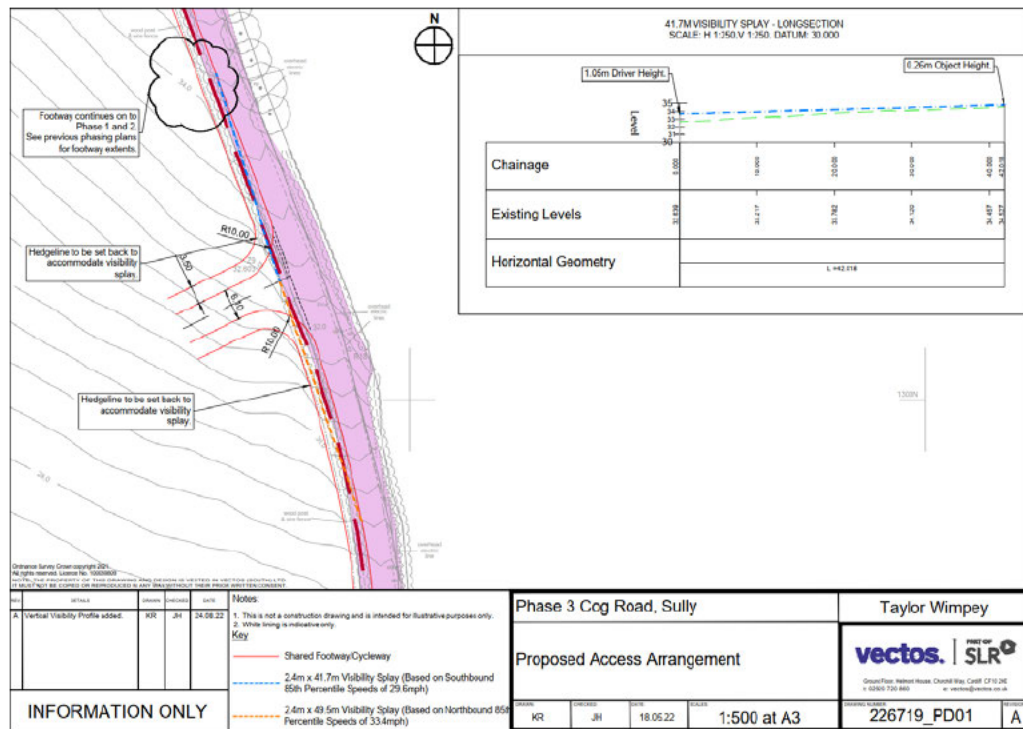
Proposed Site Allocation and Access

The proposed allocation would consist of up to 260 dwellings, comprising a mix of dwelling types and tenures. The quantum that may be shown in the masterplanning may be less, but the site has previously been 'stress-tested' for 300 dwellings.

Vehicular access will be located on Swanbridge Road via a priority junction into the site. It will be in the position of the existing double gated field access.

The development will provide the necessary pedestrian and cycle infrastructure within the site to encourage walking and cycling and the appropriate road cross sections and speed limits to support this.

There is potential to provide a pedestrian / cycle link travelling west, from the southwestern corner of the development, connecting with the existing footpaths which link to Arlington Road and Brean Close.





Sustainability Credentials

The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport.

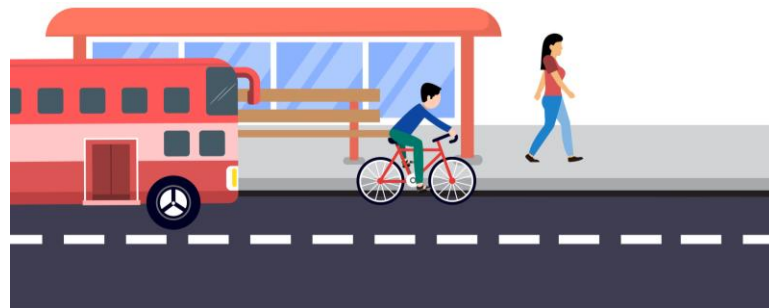
Existing infrastructure includes:

- Bus Travel towards Barry, Penarth and Cardiff;
- Access to Cadoxton (Barry) and Penarth railway stations;
- Existing walking and cycling routes in and around Sully.

Furthermore, Sully benefits from a range of facilities used on a daily basis including the Primary School, sports fields, a Post Office, a convenience store (One Stop), a GP Surgery, a pharmacy, plus some pubs and restaurants.

Future Infrastructure which aid the accessibility of the site includes:

- Benefits associated with ongoing and planned South Wales Metro improvements;
- Future Active Travel routes as set out in the online Active Travel Network Maps (ATNMs);
- Specifically, the proposed Sully to Penarth mixed use link.





Existing Accessibility

An overview of the existing infrastructure in the area



Existing Active Travel Routes

Walking

The residential area to the west of the site benefits from an excellent provision of footways and footpaths. The local roads have street lighting with good natural surveillance. These routes provide pedestrian links to amenities and local services in the west of Sully.

The B4267 South Road is the main road through Sully and is where most of the village's amenities and services are located. The road is facilitated with footways on both sides, pedestrian crossings and street lighting.

An extensive local Public Right of Way (PRoW) network provides access to Penarth, Dinas Powys and Barry, and the nearby Wales Coastal Path offers an attractive local leisure route.

In terms of the improvements which are associated with Phase 1 and Phase 2 of the development to the north, a new pedestrian link is to be formed on the western boundary to link to the existing footpath network.

Existing Active Travel Routes





Existing Active Travel Routes

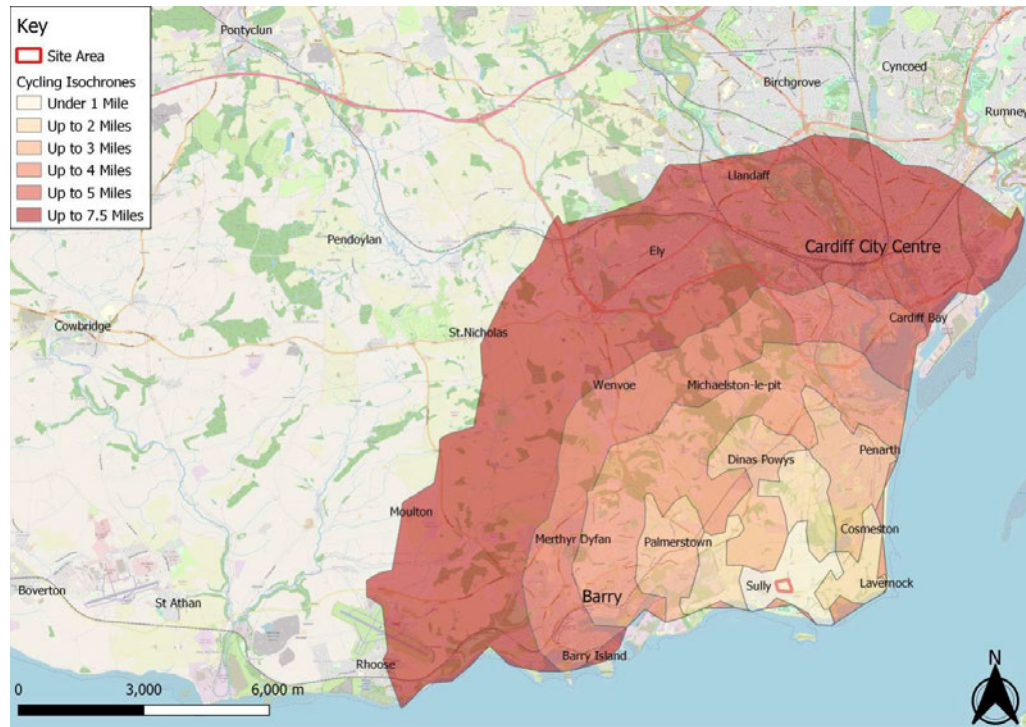
Cycling

The roads in the vicinity of the site are generally in a good state of repair, are lightly trafficked, and have good forward visibility, and are conducive to cycling.

A shared footway / cycleway extends along South Road and Lavernock Road as far east as the outskirts of Penarth and as far west as Sully Library. This route connects to the very southern end of National Cycle Network Route 88, which terminates Cosmeston Drive in in Penarth

There are other roads are conducive to cycling in the vicinity of the site, in that they are in a good state of repair, lightly trafficked, and have good forward visibility for the most part. However, the proclivity for people to cycle does also depends on distance to local services and facilities as well as the quality of the routes.

Cycling isochrones





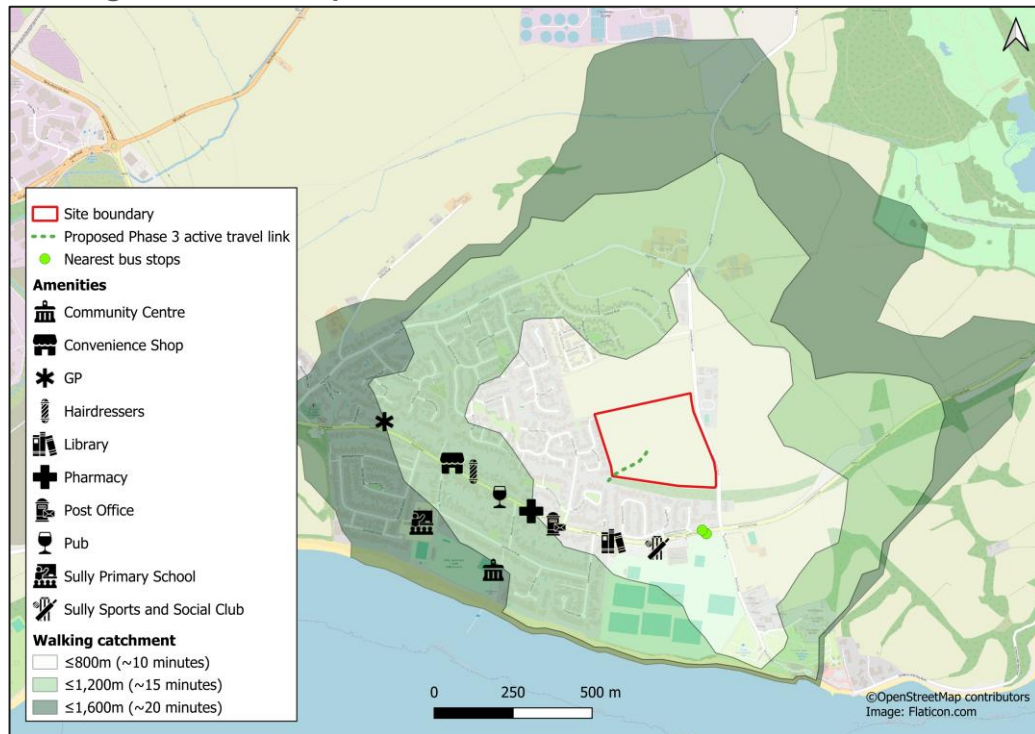
Local Amenities

With a population of approx. 4,700 at the time of the 2021 Census, Sully is of a size where it naturally benefits from a good range of local amenities and services.

It is therefore anticipated that a high proportion of future site residents' day-to-day journeys would be contained within the village. The distances from the site to the various local amenities are short and lend themselves to walking and cycling.

The adjacent Walking Catchment map illustrates approx. 10, 15 and 20 minute walking distances from the site as well as the locations of Sully's various amenities and local services. It demonstrates that, from the site, the whole village would be a comfortable walking distances for most people.

Walking Catchment Map





Local Bus Stops

The nearest pair of bus stops (*South Road before / after Swanbridge Cross*) are situated to the west of the Swanbridge Road / South Road junction near the Sully Sports and Social Club, approx. 400m metres from the centre of the site.

Both of these stops benefit from a bus shelter and timetable information and are accessible via continuous footways from the site.

An existing zebra crossing across South Road assists pedestrians in accessing the Barry bound services.

Using these local stops, bus passengers can access two services which provide regular and frequent connections between Barry and Cardiff via Penarth.

The walk time to the Swanbridge Cross bus stops from the proposed site access at Swanbridge Road is approx. four minutes.

Approx. bus journey times to local key destinations are as follows:

- Penarth: ~20 minutes
- Barry: ~30 minutes
- Cardiff: ~45 minutes

Sheltered Bus Stop at Swanbridge Cross





Local Bus Services

Bus Departure Times From Swanbridge Cross

Service	Route	Weekday			Saturday			Sunday			Operator
		First	Last	Freq.	First	Last	Freq.	First	Last	Freq.	
94	Cardiff - Barry	07:08	23:28	2/hr	07:29	23:28	2/hr	07:38	20:30	1/hr	Cardiff Bus
	Barry - Cardiff	06:24	22:27	2/hr	06:14	22:27	2/hr	06:47	21:46	1/hr	Cardiff Bus
88	Penarth - Barry	07:36	15:36	1/hr	07:36	15:36	1/hr	-	-	-	Adventure Travel
	Barry - Penarth	07:17	16:17	1/hr	07:17	16:17	1/hr	-	-	-	Adventure Travel



Railway Station Access

Cadoxton railway station to the east of Barry is the closest railway station at approx. 4km from the site. Trains running between Barry and Cardiff on the Barry and Vale of Glamorgan line stop at Cadoxton every approx. 15-minutes in each direction during the daytime. Park & Ride facilities are available at the station with 31 car parking spaces and two cycle spaces provided.

Penarth Railway Station is approximately 5km to the east of Sully and on the Penarth Line. A 15-minute service operates on this line during the daytime. Park & Ride facilities are available at the station. A total of 15 car parking spaces and 10 sheltered cycle spaces are provided.

The 94 bus service provides a service which stops adjacent to Penarth railway station.

'Access for All' is a major Network Rail scheme that funds step-free access at railway stations nationwide.

As part of this scheme, works were completed in 2020 on £3 million worth of upgrades which have delivered the following:

- Installation of lifts;
- A new waiting shelter on platform 2;
- Installation of tactile paving at platforms; and
- A new ramp leading out of the ticket office.

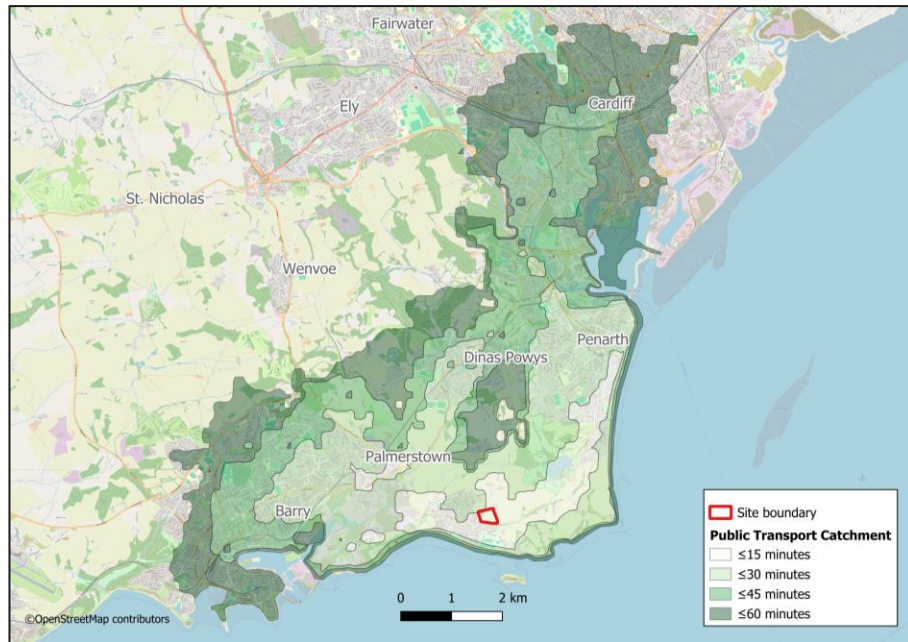


Local Public Transport Connectivity

Local Public Transport Routes



Site Public Transport Catchment (Bus and Rail)





Future Accessibility

An overview of the future infrastructure in the area



Future Active Travel Routes

Vale of Glamorgan Council's Integrated Network Maps set out aspirations for improving the active travel network across the County over the next 15 years.

As shown in the adjacent map, several newly proposed active travel routes run close to the site including a new walking / cycling route along Swanbridge Road.

Locally, these routes would improve pedestrian and cycle connections across Sully and would provide new active travel links towards Barry, Penarth and beyond.

These new active travel links are now beginning to come forward as planning applications. An application seeking a new route between Palmerstown and Dinas Powys was submitted in March 2025.

Future Active Travel Routes





Sully to Cosmeston Active Travel Route

The Sully to Cosmeston Active Travel Link is a significant initiative by the Vale of Glamorgan Council aimed at enhancing local sustainable transportation options.

The project is part of a broader effort to promote walking and cycling as viable alternatives to car use, aligning with the council's commitment to reducing carbon emissions and improving public health.

The proposed shared pedestrian and cycle path will link Sully and Cosmeston and will facilitate safe and convenient travel for both residents and visitors.

The plans involve widening existing paths, clearing overgrown vegetation, and implementing landscaping improvements to ensure the route meets Active Travel standards.

A Planning Statement was published in October 2024 and a full planning application is due to be submitted in 2025.

Sully to Cosmeston Active Travel Route





The South Wales Metro

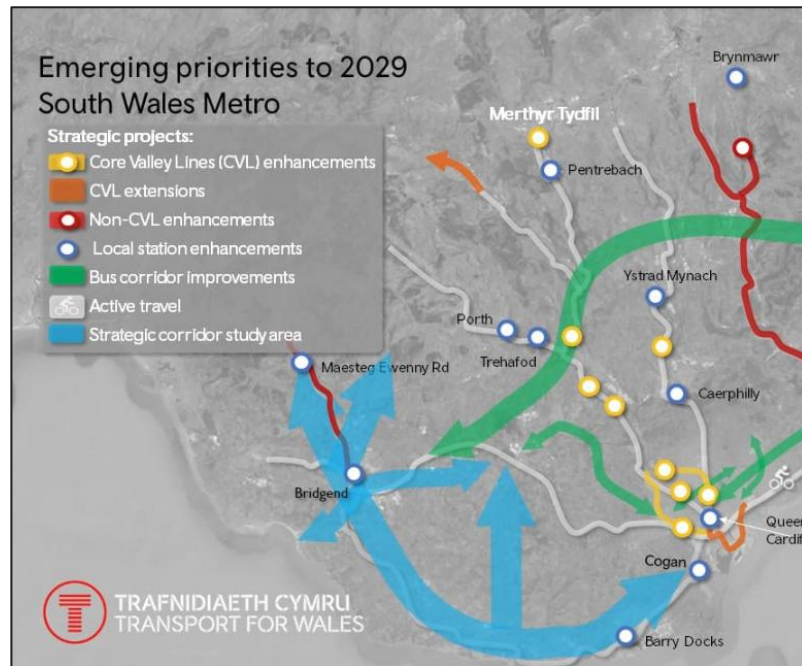
The South Wales Metro is set to significantly improve public transport connectivity across Cardiff, the Valleys, and beyond.

Whilst the Vale of Glamorgan does not yet form part of the ongoing delivery of the Metro, it does form part of a Strategic Corridor Study Area and will be subject to future research for improvement recommendations.

Preliminary suggestions that would benefit the Vale of Glamorgan as well as existing and future residents of Sully include the following:

- Enhanced rail provision in Barry and Penarth;
- Station upgrades at Barry Docks and Cogan; and
- A metro connection between Cardiff and Lower Penarth.

Extract From TfW Website





Comparison with Other Sites

Site 376: Land West of Swanbridge Road (Phase 3), Sully (This Site)

and

Site 449: Land at Weycock Cross, South of Port Road, Barry



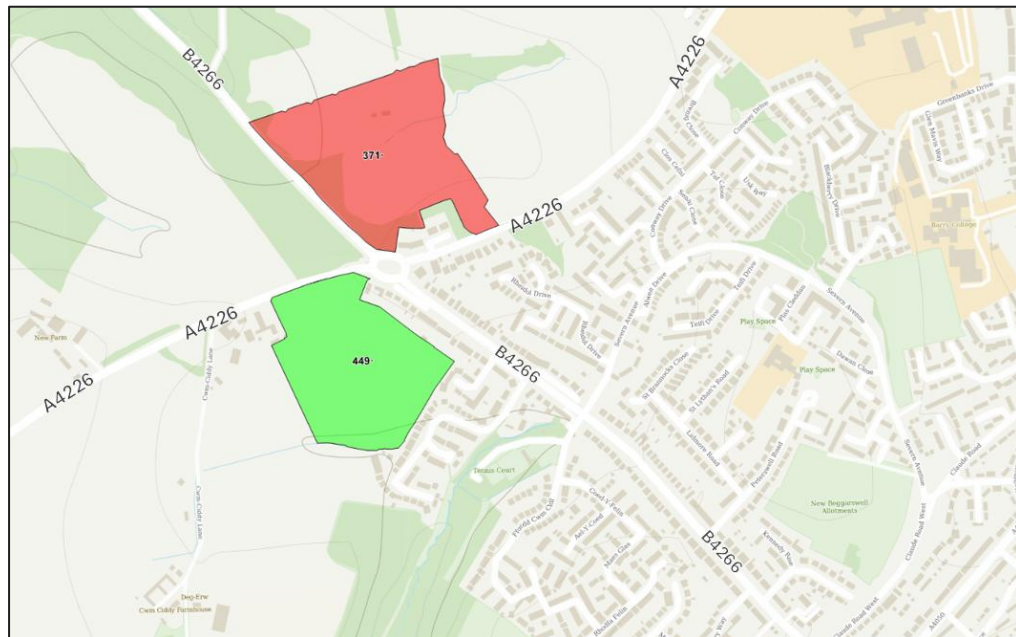
Site 376 and Site 449

A comparison of Site 376 (Land West of Swanbridge Road Phase 3, Sully) is provided with Site 449 (Land at Weycock Cross, South of Port Road, Barry).

The purpose of this comparison is to highlight the sustainability credential of Site 376 and to promote its inclusion within the replacement LDP.

Site 449, west of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road. The eastern and southern boundaries of Site 449 abut residential properties and so it is proposed that access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

Site 449 is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Site 376 in Sully benefits from its proximity to the High Street in Sully and the services there.





Distances to Local Facilities

As demonstrated previously, Site 376 is well situated to encourage active travel journeys to local amenities.

The adjacent table demonstrates that walking distances from Site 376 to various local facilities are generally a lot more favourable than Site 449.

It should be noted that, although the walking distance from Site 449 to the nearest bus stop is slightly less than Site 376, the bus services that can be accessed from Site 376 are more frequent and more direct than those which can be accessed from Site 449.

Walking distances to local facilities

Proximity to:	Site 449: Land at Weycock Cross, South of Port Road, Barry	Site 376: Land West of Swanbridge Road (Phase 3), Sully
Bus Stop	300m	450m
Post Office	1.4km	500m
Pharmacy	1.3km	500m
Primary School	1.3km	900m
GP Surgery	1.5km	950m
Sport and Leisure Facilities	1.6km	600m

Green = ≤ 10 minute / 700m walk

Orange = ≤ 15 minute / 1km walk

Red = > 15 minute / 1km walk



Summary

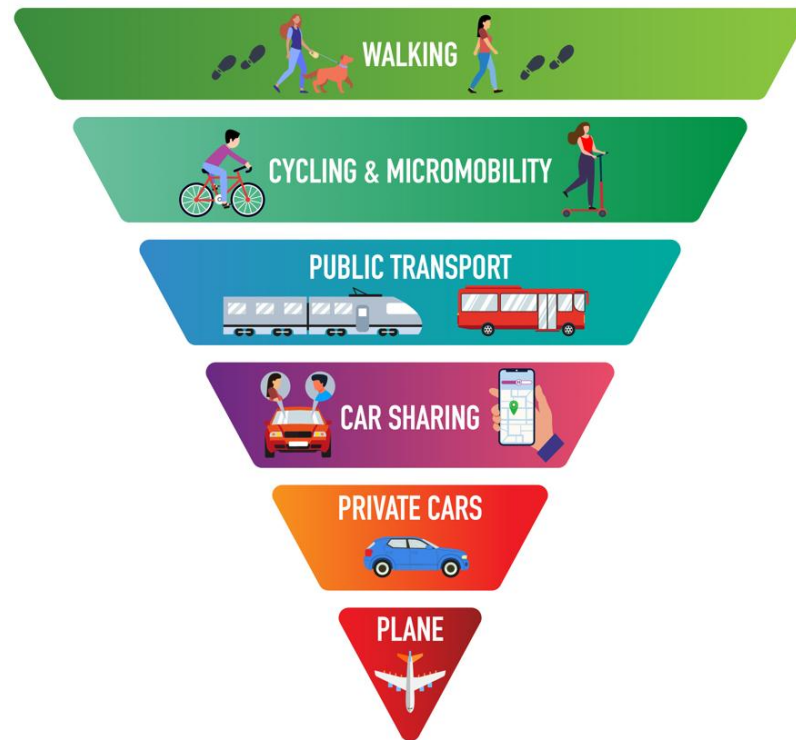


Summary

The aim of this document is to re-iterate the sustainability credentials of the site.

The site is located adjacent to an existing Local Plan allocation (MG2 (37) 'Land West of Swanbridge Road, Sully') and is in close proximity to a number of local facilities within Sully. In addition, Sully has a regular and reliable public transport offer, including bus services a short distance from the site, that further boost the accessibility of the site and railway stations providing services to Barry and Cardiff.

The local active travel network is of a good quality and is proposed to be improved soon, with a share use path (SUP) included as part of the allocated site mitigation measures.. These all contribute to a site that is well located with regards to local facilities and would ensure the site's integration to the surrounding area with opportunities for new residents to travel by alternative travel modes and thus not reliant on car-borne trips.





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