

Introduction

These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.

Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.

Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.

That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan

Plan Period

Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy

Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

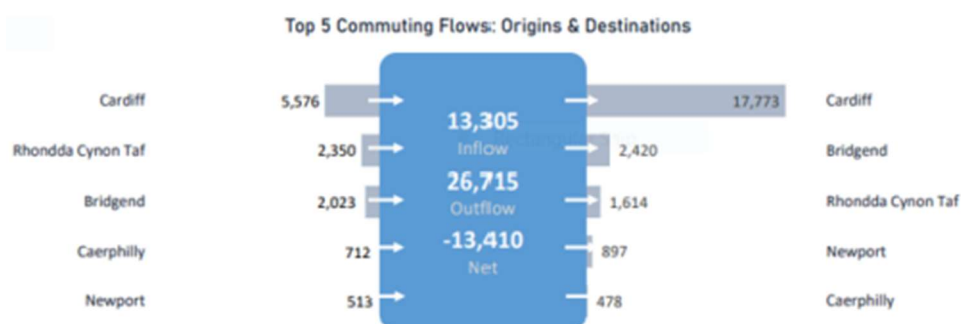
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes. Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:



St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.

Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via

bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhose to Cardiff via train is over double the time at 36 minutes.

Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.

There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places *"best served by public transport connectivity and [which] offer a good range of services and facilities"*, then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.

For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.

Policy SP2 – Settlement Hierarchy

Position: Object

Barratt Redrow objects to Policy SP2 in its current form.

The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.

That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.

However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.

The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development

of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.

In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement

Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"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. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a

useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

- Utilising past build rates incorporates recession-based trends. This includes suppressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
- Does not actively seek to address the area's ageing demographic;
- Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
- Does not seek to leverage any of the investment into the region through the CCR City Deal;
- Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
- During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)⁴ found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.

This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment).

Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been suppressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a 1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those

circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms. Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory

Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan. This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability. The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current

economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements

Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may

negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis. The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio

Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

- the Plan is overly reliant on a small number of key sites;
- medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
- windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
- rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would

query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

- From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
- If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
- The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites

Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.

Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.

The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.

We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around

funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.

St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.

Policy CC1 – Residential Operational Net Zero Carbon Development

Position: Object

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.

There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will

be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."

That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.

Policy SP5 – Creating Healthy and Inclusive Places and Spaces

Position: Support in principle / Comment in part

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.

We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.

Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.

Policy CC2 – Presumption Against Demolition

Position: Support in principle / Object in part

Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.

Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.

There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.

Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan

Position: Object to omission

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.

The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.

Deposit Plan Conclusion

Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.

In particular:

- The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
- the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
- the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
- the Plan relies too heavily on key sites, rolled forward sites and windfalls;

- the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
- the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register – Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

- The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
- The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
- PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
- The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

- **Developer Interest:** should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
- **Historic Environment:** should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
- **Special Landscape Area and Glamorgan Heritage Coast Designations:** should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
- **Environmental & Physical Constraints Conclusions:** should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
- **Access/proximity to services and facilities conclusions:** should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
- **Connectivity and Capacity:** should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

- **Climate Change:** should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO₂.
- **Placemaking Character and Place:** should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
- **Suitable for Further Consideration:** should be amended from red to green for the reasons set out below and within the candidate site submission.

Suitability for Allocation and Key Benefits

For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW.

In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

The proposed development of the site would deliver the following key benefits:

- Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
- The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
- The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
- Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
- Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
- Economic benefits – including that the proposed development is expected to:
 - o Support the employment of 434 people;
 - o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.

It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.

Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.

I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.