

ANNEX 1

Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

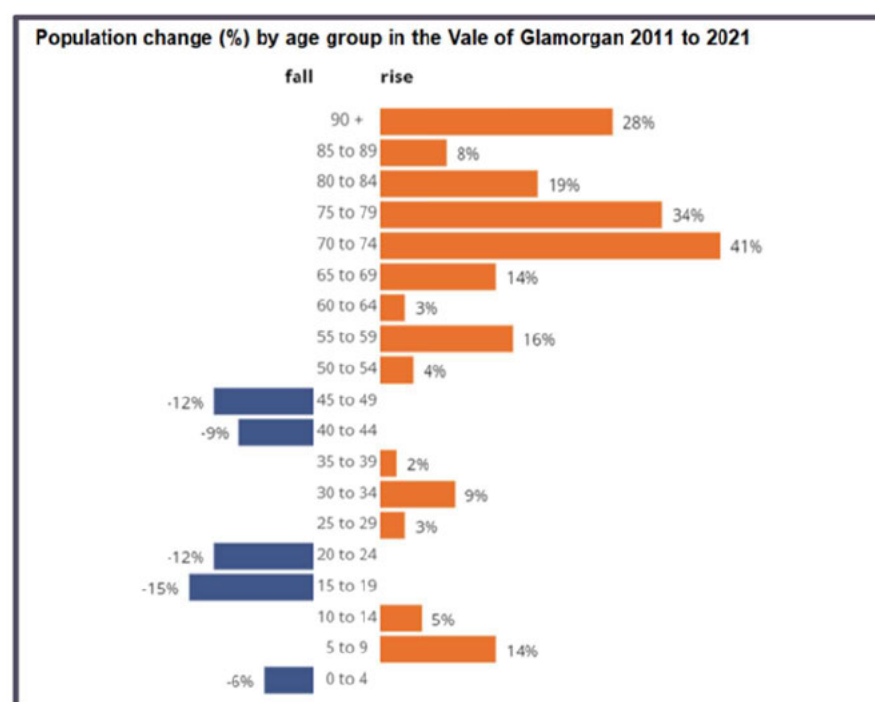
1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:



VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: *"There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations... The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."*

Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: *"Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement."* (Page 66)

Para 5.25 states *"Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord"*.

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the “soundness” of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states *“The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities”*. The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) – as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas – given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations – Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of ‘key sites’ to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

- Land at North West Barry – 376no. units;
- North of Dinas Powys – 250no. units;
- Land at Readers Way, Rhoose – 520no. units;
- Land at Church Farm, St Athan – 532no. units; and
- Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

- *“Time period of pre-application discussions/PAC consultation” – 4 months*

- *"Time between submission of planning application and determination" – 6 months*
- *"Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months*

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swift as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

- Existing land supply (3,838 units)
- Windfall sites (1,303 units)
- Allocated sites (3,521 units)

Para 6.69 states that *"Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".*

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

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

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites: 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that *"there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered."* The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

Site Name	Status	Number of units	Comment
Land to the west of Pencoedtre Lane, Barry	LDP Allocation	135	Site part of Council's Housing Delivery Programme – no planning application submitted to date but the site is actively being progressed.
Land at the Mole, Barry	LDP Allocation	65	Part of Barry Waterfront allocation. Planning application awaiting determination (2023/00051/HYB)
Land between new Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)	LDP Allocation	235	Recently purchased by WG – no planning application submitted to date, but application anticipated in the near future.
Land adjoining St. Athan Road, Cowbridge	LDP Allocation	105	Planning application awaiting determination (2022/00958/FUL)
Former Stadium Site, Burley Place, St. Athan	LDP Allocation	80	Planning application awaiting determination (2024/01152/FUL)
Land north of the Railway Line, Rhoose (East)	LDP Allocation	339	Planning application awaiting determination (2022/00733/FUL)
		959	

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

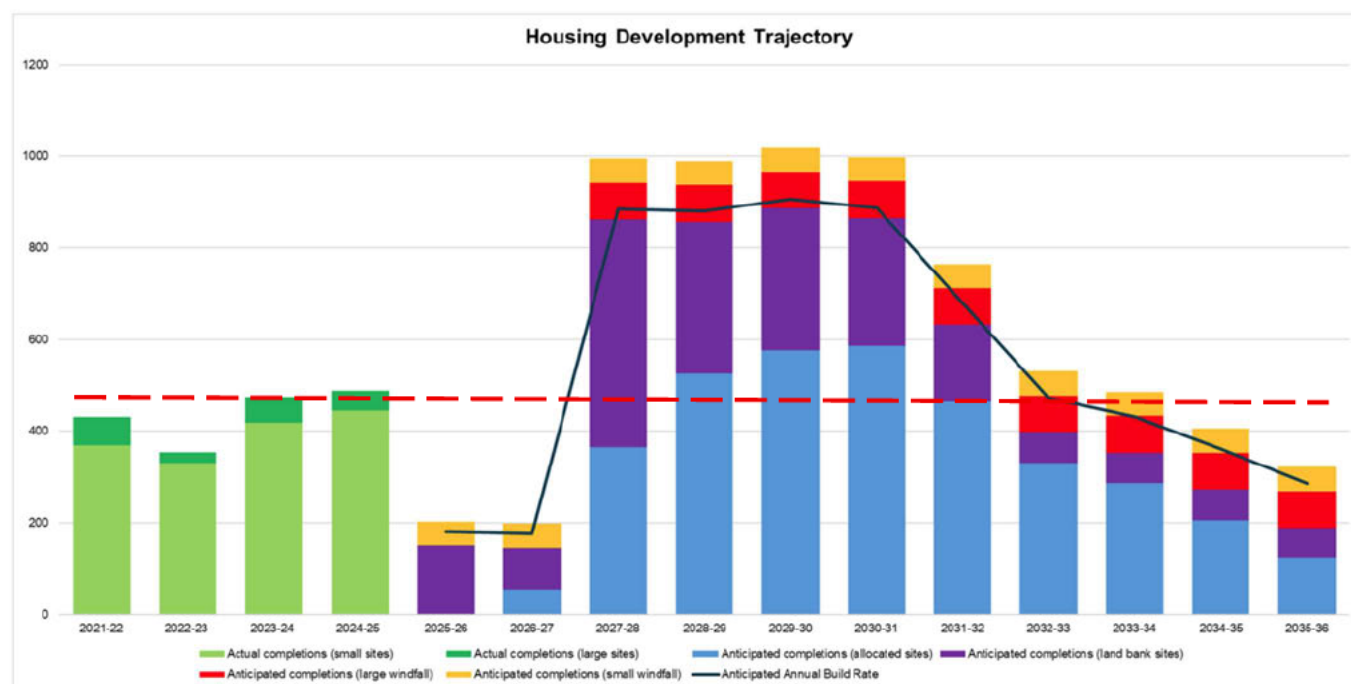
As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.



Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

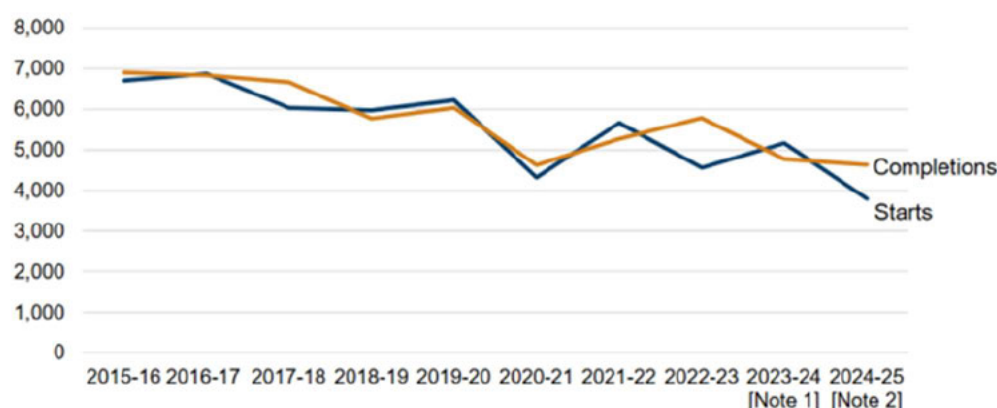
circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 – 2025 has been approx. 400 – 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025–2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025–26 to 1000 in 2027–28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period – to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021–2025.

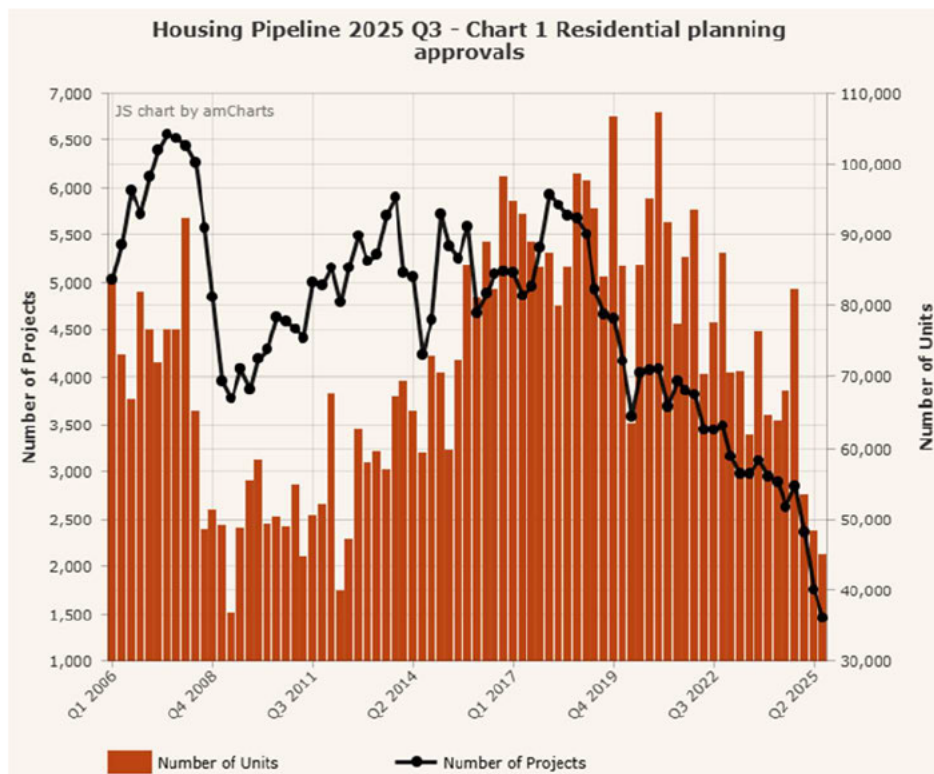
Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Figure 1: Number of new dwelling starts and completions, 2015-16 to 2024-25



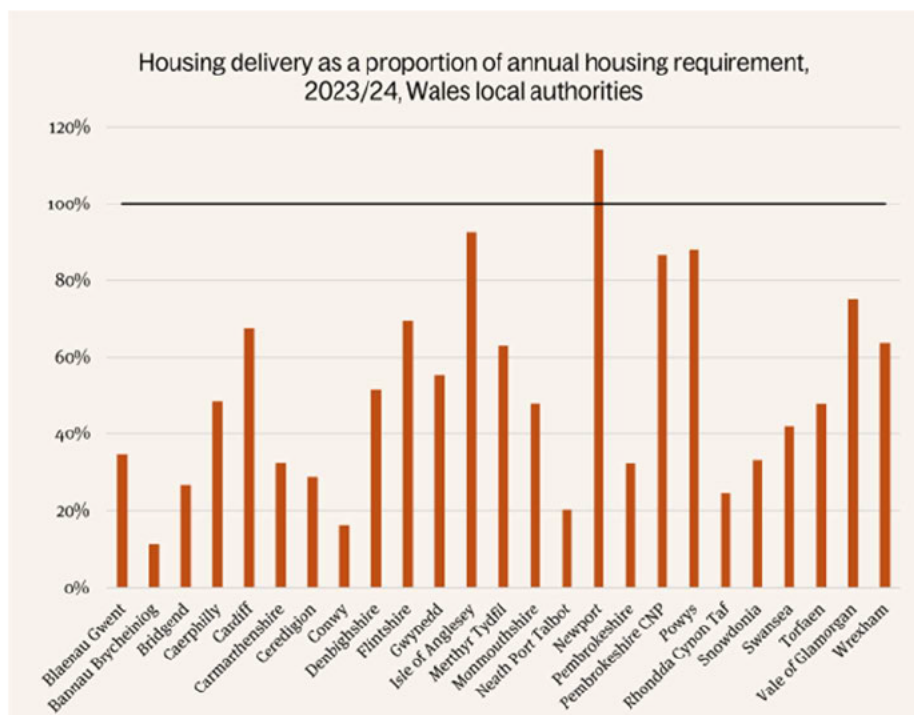
Description of Figure 1: 'New House Building: April 2024 to March 2025'

As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.



HBF Graph Illustrating Residential Approvals (2006-2025)

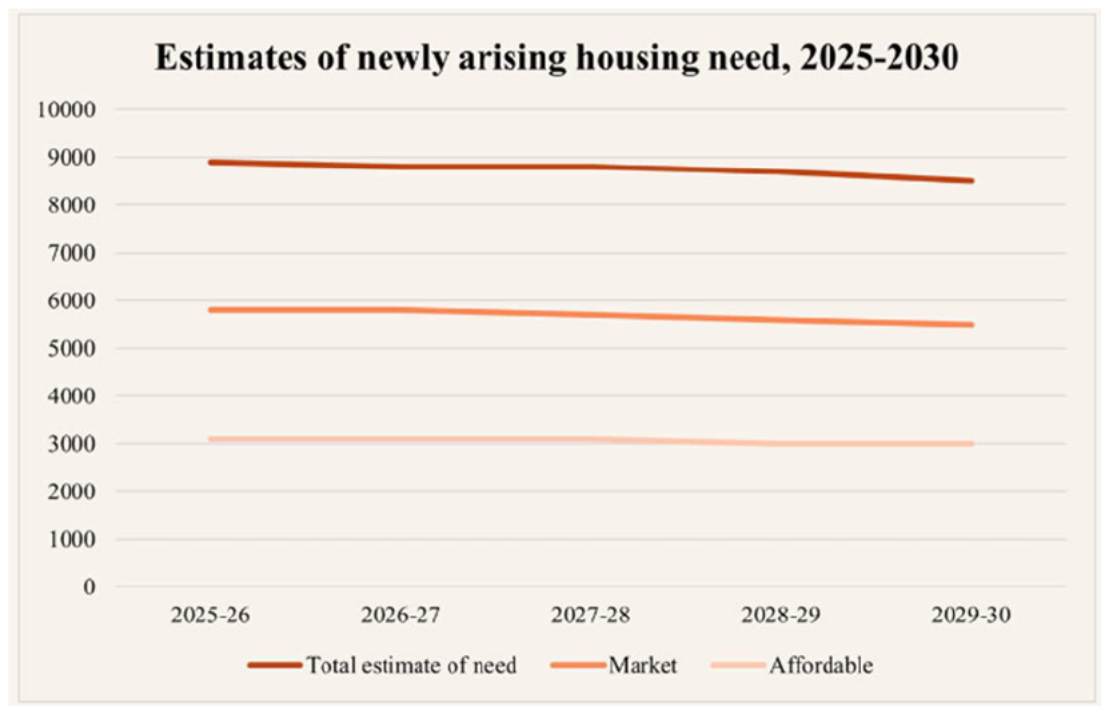
The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document [‘Increasing Housing Supply in Wales’ \(4th September 2025\)](#) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.



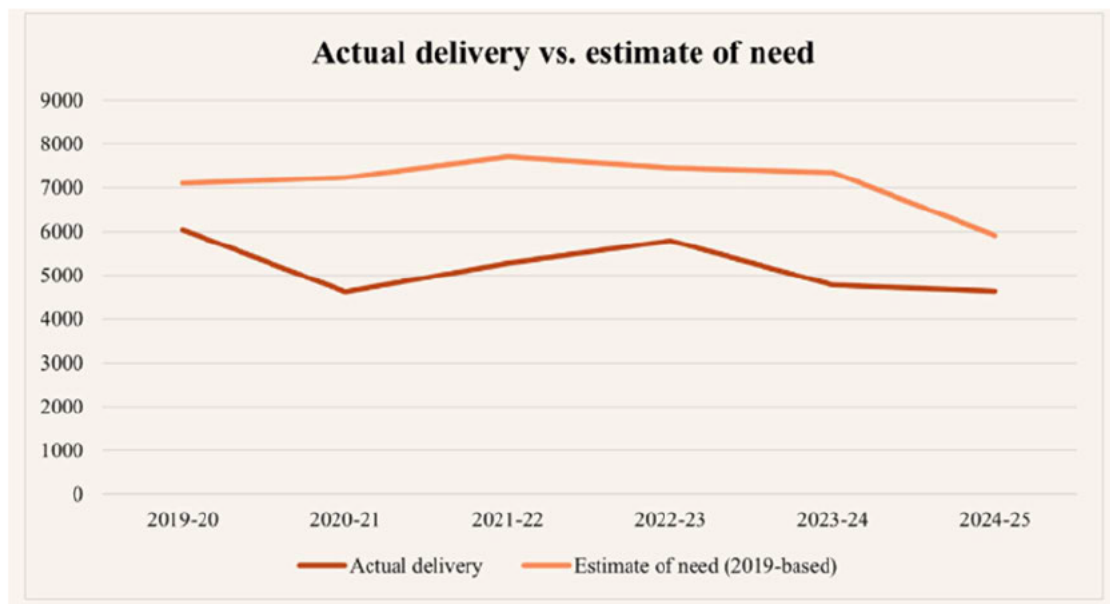
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Housing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.



HBf: Estimates of Housing Need



HBf: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 – Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

Site Reference	Settlement	Site Name	Number of units
HG4 (1)	Colwinston	Land to the East of Colwinston	25
HG4 (2)	Aberthin	Land west of Maendy Road	25
HG4 (3)	Wick	Land at Heol Fain	50
HG4 (4)	Fferm Goch	Land north of West Winds Business Park	22
Dwelling Contribution			122

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancafarn housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

- Cowbridge Comprehensive School;
- St Nicholas Primary School;
- Cowbridge Health Centre; and
- Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in **red**:

6.140 *"For the purposes of this policy, 'small-scale' will generally mean ~~no more than~~ **around** 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites*

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.



SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

- In summary, the opportunity of the site seeks to deliver:
- Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
- Highways infrastructure within the site;
- Upgraded access to the site;
- Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
- Green Infrastructure; and
- Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

- Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
- Object to the level of growth identified for the Plan period;
- Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the “soundness” of the Plan;
- Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan’s housing land supply;
- Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
- Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
- Object to the current wording of the HG5 Policy ‘Affordable Housing Exception Sites’ which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
- Object the Council’s assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale’s identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.