



Geraint John Planning

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By Email: ldp@valeofglamorgan.gov.uk

Vale of Glamorgan Council
Civic Offices
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Dear Sir / Madam,

Vale of Glamorgan Replacement Local Development Plan (RLDP) Preferred Strategy

Representations regarding the Preferred Strategy – Land South of the A48, Bonvilston - 435

Please find enclosed, on behalf of, and under instruction from our client, Peter Stone Properties Ltd., representations for consideration as part of Vale of Glamorgan's RLDP Preferred Strategy.

This submission comments on the Preferred Strategy, and by association the candidate site promoted in the LDP Call for Candidate Sites for proposed allocation 435 – Land South of the A48, Bonvilston. The site failed Stage 2 of the Candidate Site Assessment where it is stipulated, *'The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area. The site would result in a loss of the either Grade 1 or 2 agricultural land contrary to national policy. Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.'* Our detailed representations (providing comments on the Preferred Strategy published by the Council) and a rebuttal / response to the evaluation of the candidate site are included as an Annex to this letter.

The Preferred Strategy provides for the level of housing growth and provision over the Plan period, and its spatial distribution. These submissions have carefully reviewed and assessed the Preferred Strategy in terms of sustainable development, and outlines what is considered to be the most suitable growth and spatial distribution options for the Vale of Glamorgan.

Summary of these representations

In short, and to summarise the case made and set out, these representations object to both the level of growth identified for the Plan period, as well as the spatial distribution options chosen to underpin the strategy.



Detailed submissions and objections are raised in respect to the Strategic Policies that underpin and seek to define the Strategy, whilst it is submitted that the Strategy does not reflect, nor deliver, the Vision of the Plan, nor a number of its defined Objectives.

The Strategy, and the distribution of growth, has been based on a distorted evaluation of the appropriateness of locations for development, not least an overreliance on rail services as a driver to and justification for the location of the identified growth.

The Strategy to allocate new growth solely, and only, in the Strategic Growth Area – an area already well provided for in terms of as yet to be developed allocated sites (which will be rolled forward into the emerging plan) and existing commitments (sites with planning permission). The allocations identified will according be over and above, and in addition to, this already identifiable supply of housing land. By contrast, allocations elsewhere within the Plan area have been built out and/or are nearing completion – hence, the need for new and additional ones.

The Strategy ignores, and makes no provision for, those parts of the Vale which were considered accessible, sustainable, and by association, suitable for housing growth in the current (adopted) Development Plan, and where there is a strong track record of delivery and yield of housing. The Strategy adopts an insular approach to meeting the Plan area's growth needs, ignoring (and to the detriment) of those parts of the Vale which have a strong relationship with areas, key settlements, and growth locations beyond the administrative area (in particular to the west, and to the north).

It is accordingly considered that the Strategy needs to be reconsidered, and a more balanced and equitable distribution of housing sites identified across the entire Plan area. To not do so would bring into question the deliverability of the Plan, and by association, its "soundness".

The site, the subject of this representation, has been assessed and evidenced to be readily available, suitable and deliverable (not least as a result of a comprehensive suite of assessment information), and ought accordingly to be considered favourably for allocation as part of any revised Strategy.

Notwithstanding this, and irrespective of any revision (or otherwise) to the Strategy, the site should be allocated for an affordable housing led development site – consistent with, and to meet the identified need and intent of the Plan to allocate a number of such in minor rural settlements.

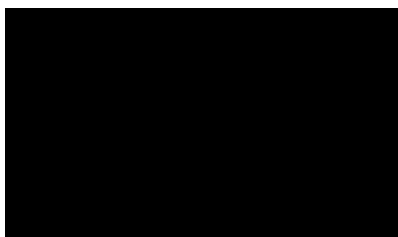
The objection is set out in full in these representations within the Annex, which addresses these issues, and is structured in line with and to respond to the Questions set out in the Preferred Strategy Representation Form.

The Illustrative Concept Masterplan for 'Land South of the A48, Bonvilston', and submitted with the Candidate Site representations, is enclosed for reference.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority comes to evaluate matters.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely



Geraint John

Director

Geraint John Planning Ltd.

Annex

Preface

This Annex sets out the detailed case in support of these representations.

The representations are structured as follows:

- SECTION 1: Consideration of the Proposed Preferred Strategy and associated evidence / options etc;
- SECTION 2: Response to the Preferred Strategy (based on the Questions set out in the Preferred Strategy Representation Form); and
- SECTION 3: A summary of the suitability of the site for development including a response to the Candidate Site Assessment.

SECTION 1 Consideration of the Proposed Policies / Policy Designations

Background to the publication of the Preferred Strategy

To support an understanding of the Vale of Glamorgan Preferred Strategy (November 2023), and the opportunities associated with the Paper, it is imperative to consider and to document the content of the Preferred Strategy in the context of the preparation of the Replacement Local Development Plan.

Issues, Vision and Objectives Paper (June 2023)

Firstly, the Issues, Vision and Objectives Paper (June 2023) plays a key role in informing the Preferred Strategy. It identifies the key issues, challenges and opportunities facing the county, which is informed by an extensive evidence base including, but not limited to, the Initial Integrated Sustainability Appraisal (October 2023) and Habitats Regulation Assessment (September 2023).

Overall, there are a number of issues that are to be addressed in the RLDP, and those relating to the Land South of the A48, Bonvilston site include:

- Improving Physical and Mental Health and Well-being
- Homes for All
- Placemaking
- Enhancing the Natural Environment
- Promoting Active and Sustainable Travel Choices

In terms of how these issues / challenges are addressed, 10 Objectives have been developed for the RLDP. These objectives are considered key to address the core issues within the Vale including the delivery of housing and employment, responding to climate and nature emergency, safeguarding the environment, and securing high-quality design.

The Preferred Strategy and Housing and Employment Growth Options Paper (September 2023)

The Growth Options Paper (September 2023) details the level of growth that has been identified and set out by the Welsh Government and possible options for providing for growth. The papers detail 12 growth level options which are split into 3 further levels of growth (low, medium and high). The 12 options are those considered available for making provision for growth of new homes and jobs in the county over the next fifteen years - to meet both demand and an ever-increasing population.

Low growth provides for the lowest possible growth over the plan period, whilst Medium and High growth consider higher levels of growth. The data provided suggests low would provide a residual requirement for up to 400 dwellings per annum, and 200 jobs per annum. Medium growth equates to an additional 400 to 550 dwellings per annum, and 250 to 350 new jobs per annum, whereas High growth for an additional 550 to 700 dwellings per annum and 425 to 500 new jobs per annum.

Vale of Glamorgan Council RLDP Preferred Strategy – (November 2023)

The Vale of Glamorgan RLDP Preferred Strategy outlines the strategic direction for the development, and use of land in the county over the Plan Period 2021 to 2036. The Strategy (consistent with the Housing and Employment Growth Options paper) relates to the quantity of development, and its spatial distribution in the county throughout the duration of the 15-year plan period. 12 individual growth options were considered and grouped into three potential levels of growth (low, medium and high) to be targeted in the Plan period. Please see relevant table below:

Scenario	Change 2021-2036				Average	
	Population change	Population change %	Households change	Households change %	Net migration	Dwellings
Dwelling-led 5Y	19,048	13.9	10,062	16.9	1,360	6
PG-5Y	16,923	12.4	9,187	15.4	1,222	6
Employment-led ELR	13,224	9.8	7,599	12.9	1,020	5
WG-2018-HIGHPOP	13,127	9.7	7,500	12.7	938	5
Dwelling-led 10Y	13,154	9.7	7,587	12.8	1,009	5
Employment-led ELR (CR 1-1)	10,719	7.9	6,548	11.1	869	4
WG-2018	9,787	7.3	6,214	10.6	851	4
PG-Long Term	8,561	6.3	5,705	9.6	739	3
PG-10Y	8,519	6.3	5,695	9.6	741	3
WG-2018-	5,172	3.8	4,550	7.8	750	3

Option	Dwellings per annum	Jobs per annum
Low	150 to 400	-125 to +210
Medium	400 to 550	240 to 250
High	550 to 700	400 to 500

Summary of / Categorized Growth Options

The Preferred Strategy emphasises that the direction set out by Future Wales is that growth levels in the Vale of Glamorgan are to be sufficiently ambitious and complementary to Cardiff in order to maximise Cardiff's role within a National Growth Area. The Preferred Strategy approaches the direction set by Future Wales through three Strategic Growth Options. Medium growth (Dwelling-led 10Y) is highlighted in the Strategy as the most appropriate growth Option, with it being considered to be supported by the strongest evidence and reflects the level of growth that has been delivered in recent years. The Preferred Strategy identifies low growth as having the fundamental drawback of

falling short in delivering the evidenced need for new homes and jobs. In the past 5 years, the Vale has experienced a high level of inward migration from Cardiff, which is coinciding with a period of high levels of additional new housing being developed in the Vale. A continuation of this would provide a balanced demographic in the Vale of Glamorgan, it would not reverse the trend of an increasingly ageing population.

In addition, the Preferred Strategy sets out 4 Spatial Growth Options for how growth can be distributed in the county. The Preferred Strategy states at Paragraph 6.36 that the Sustainable Transport Oriented Growth Option is the most appropriate and the strategy therefore seeks to promote development in the Strategic Growth Area. This is due to the stance that the option focuses on allocations and new development in sustainable locations where new residential development can be aligned with other uses and where there are current and proposed sustainable transport options to reduce the need to travel by car.

For reference the 4 Spatial Growth Options are as follows:

- Option 1: Continuation of Adopted LDP Growth Strategy;
- Option 2: Dispersed Growth;
- Option 3: Focused Growth; and
- Option 4: Sustainable Transport Oriented Growth.

SECTION 2 Response to Preferred Strategy

This response is structured to address the questions as set out on the Council's Virtual Consultation Room.

Questions 1: Key Characteristics

Section 3 of the Preferred Strategy sets out the key characteristics of the Vale of Glamorgan. Do you agree that the key characteristics accurately portray the Vale of Glamorgan?

We do not agree that the key characteristics set out in Section 3 of the Preferred Strategy accurately portray the Vale of Glamorgan, and accordingly object to it on this basis.

We consider the methodology set out within the Settlements Appraisal that informed the settlement scores to be inaccurate. The scoring methodology was based on the following three principles:

- Principle 1 – The level of sustainable transport and accessibility in and around settlements.
- Principle 2 - The availability of local facilities and services in and around settlements.
- Principle 3 - The level of employment opportunities in and around settlements.

Principle 1 – The level of sustainable transport and accessibility in and around settlements.

The scores derived to inform Principle 1 are not considered to be entirely representative of the real and actual sustainability of the areas assessed. As per Table 3 (Public Transport Access / Provision Scoring Matrix), the value of rail links were given more weight / scored more highly than bus links or active travel links, with no justification set out for this. Moreover, bus services were more heavily and pessimistically scrutinised in their assessment than rail facilities. For example, bus services were assessed on their availability and frequency, whereas Rail services were assessed solely on availability. Further to this, the assessment makes no reference to recent rises in rail fares or strikes that resulted in an increased reliance on bus use. Accordingly, the findings of the appraisal are considered overly supportive of areas with existing rail services, directly influencing and distorting the areas to which new housing has been appointed.

It is widely accepted, and most notably highlighted within Planning Policy Wales 12, that achieving sustainability for new developments revolves solely around reducing the need to travel by private car. This can be achieved by ensuring development is closely associated with all, and a variety of, forms of active and public transport – not specifically rail services. Accordingly, it is not considered that the availability of bus routes or active travel routes have been taken into account appropriately within the scoring of the Sustainability Appraisal.

To reinforce the above position, and to illustrate and evidence the point in specific reference to the site subject to this representation (located in Bonvilston) reference is made to application ref. 2015/00960/FUL – Land at Sycamore Cross. The current LDP positively considered this site and location for development and a subsequent planning application endorsed and positively determined a planning application for 120 residential units. An aerial view extract is outlined below to give spatial context to the example:



Spatial context of site allocation 435 (circled in blue) and approved scheme 2015/00960/FUL (circled in red)

The Officer's Report on the planning application stated: *'Overall the site is considered to be sufficiently sustainable and in accordance with the sustainability principles and objectives as set out in paragraph 4.2 of PPW'*. This principal assessment was made on the basis that there was adequate availability of bus and active travel links along the A48 to serve residential development in line with national and local policy. Moreover, the scheme made provision for enhanced active travel facilities and measures along the A48 frontage, not least the provision of a shared (cycle and pedestrian) active travel route, and comprehensive upgrading of the Sycamore Cross junction (to provide pedestrian crossing facilities etc.

Reference is made to the above to evidence that the location has previously been endorsed as sustainable. The emerging RLDP has given disproportionate weight to areas with existing rail facilities. It is not considered that areas with adequate bus and active travel facilities have been deemed sufficiently appropriate for housing allocation, which reflects the rigid scoring methodology utilised in Principle 1 that favours the presence of rail facilities.

Principle 2 - The availability of local facilities and services in and around settlements.

Principle 2 of the methodology scored settlements on their availability and distance to key services, namely health, education and retail centres. Proposed site allocation 435 – Land South of the A48, Bonvilston scored 12 on Distance to Key Services (Principle 2.2). This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. 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.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

The accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, should result in the site being concluded as sustainable in regard to access to key services.

To reinforce the above, paragraph 3.10 of the Preferred Strategy reinforces the presence of key services within the rural Vale, stating: *'The group of Minor Rural Settlements are dispersed throughout the Vale and contain a more limited but nonetheless important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'*. It is recognised therefore that the Minor Rural Settlements of the Vale do have the availability of important services and facilities that play a pivotal role in meeting people's needs and reducing the need to travel by car.

Question 2: Key Themes

The Key Themes in Section 4 of the Preferred Strategy have been identified having regard to the Vale's key characteristics, the national and local policy context and stakeholder feedback and shape the core elements of the Preferred Strategy. Do you agree that the nine themes appropriately cover the issues to be addressed?

The key themes as set out in the Preferred Strategy are generally agreed, however, it is not considered that these themes have been appropriately addressed within and reflected by the content of the Plan.

In respect of Placemaking, it states *"Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure"*. In addition, Promoting Active and Sustainable Travel Choices states *"Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel"*.

Future Wales (Policy 5) sets out that *"Planning authorities should recognise the challenges facing their rural communities and set out policies to help address them"*. It also confirms that planning authorities *"should support improvements to connectivity within and between rural settlements"* and should *"identify ways to develop stronger strategic transport links between rural areas and larger towns and cities for mutual economic benefit"*. It is considered that the Strategy does not fully address the above themes. There is a clear lack of allocations in more rural areas of the County (notwithstanding their sustainable credentials) and any supporting infrastructure for sustainable travel has been directed at only the largest, perceived to be more sustainable locations, within the Sustainable Transport Orientated Growth Option zone. The Strategy outlines that the Vale contains 4 distinct housing market areas (Barry, Penarth, Coastal and Rural). However, there are no proposed housing allocations in the Rural areas. For example, the 'Sustainable Transport' zone relates specifically and only to settlements within proximity to an existing or proposed railway station (with the exception of Cowbridge). There are many rural settlements that are well-served by existing bus services and other forms of active travel, that provide efficient access to principal areas of the Vale and beyond, however, the Strategy its current form does not intend to allocate any new housing to these areas.

Accordingly, and linking to the above, the key theme (Homes for All) is also not met within the Plan. The theme states that *'Housing supply needs to be able to respond to the authority's growing population but must also be appropriate in terms of type, tenure and location. In addition, there must be an adequate provision of affordable housing in order to cater to those in need'*. The key theme advocates for population growth (and therefore housing supply) to be achieved in appropriate locations. Notwithstanding the existing sustainable public transport networks serving the rural Vale, and the clear policy presumption in the importance and benefit of growth within these areas, there is no housing allocation within these areas. It is not considered that the emerging Plan will deliver 'Homes for All', as there is a clear direction of growth within areas associated with rail presence.

In assessing the achievability of the above key themes (Placemaking, Promoting Active and Sustainable Travel Choices, and Homes for All), it is clear that each theme has the potential to be met through the delivery of proposed site allocation 435, and other similar sites within the rural Vale.

Further to this, site 435 would also provide an appropriate opportunity to be brought forward in line with Policy SP3 under 'Additional new housing allocations including affordable led developments'. Further detail regarding this will be outlined in Question 5 and 7.

Question 3: Vision

The Vale of Glamorgan RLDP Vision sets how the RLDP will contribute to making the Vale a healthier, connected, and sustainable place where people want to live and work over the Plan period. Do you agree with the RLDP Vision?

There are several elements of the RLDP Vision that we object to.

As stated previously, Paragraphs 3.17 and 3.18 of the Strategy make reference to there being 4 district housing market areas in the Vale: Barry, Penarth, Coastal and Rural. However, the allocation of housing and the location of strategic growth neglects to include all these areas (e.g. Rural Vale) and in our view overprovides in some of these areas (e.g. Barry). For example, with limited housing stock and average house sales at over £600,000 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 1,100 new affordable homes per annum over the next five years throughout the county. 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 replacement plan period. 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.

Moreover, there is a large focus and bias in the emerging plan on the proximity of Cardiff and Airport. Paragraph 3.28 states that *"Recognised as an important gateway for business and tourism in South Wales, the airport plays a significant role in supporting the local economy and connecting South Wales to destinations across the UK and the world"*. However, the benefits of the airport proximity are considered to be exaggerated, and there is no evidence to suggest that a large proportion of residents in the Vale (a) use the airport or (b) have employment or job opportunities here which they travel for. The airport performs a regional role and facility and has no affiliation to housing need or provision at a local (Vale) level.

By contrast, the Strategy identifies that there is a high percentage of home working in the rural Vale. Paragraph 3.33 states that *"34% of workforce work from home either part time or full time"*. This is also outlined in Future Wales (Policy 5) which states: *"The increasing ability to work from home and remotely from main offices may result in higher demand to live in rural areas and opportunities to retain the working age population. This could bring positive impacts for rural enterprises and the foundational economy"*. As such, it is considered that any lack of sustainable transport options for rural Vale settlements such as Bonvilston are unfounded given that a large proportion of people working do not commute for work – or do so less than five times a week. Making provision for further houses in these rural locations could therefore be supported as travel trips would likely be lower in any event. Bonvilston also has good sustainable transport links, better than many other areas within the rural Vale, with bus services running every 30 minutes.

Moreover, there is evidence that large parts of the Vale are supported by employment outside of the Vale in areas such as Bridgend and RCT (refer to Question 5). The 'rural' areas to the west of the Vale are more likely to be supported by Bridgend given the proximity and the transport options travelling West and therefore more sustainable (than when based on proximity to 'primary settlements / Cardiff'). Accordingly, it can be considered that the long-term vision of the Strategy only relates to the development of the eastern and southern areas of the Vale, with the western and northern settlements "left behind" and "forgotten" as a result of no residential allocations in the new Plan.

Paragraph 3.40 of the Strategy confirms that the Vale contributes to the tourism sector, with numbers recovering to pre-pandemic levels in 2021 (day visitors at 4.23 million). It is considered that the rural Vale plays a significant part in providing a level of tourism for the Vale as a whole, through holiday lets and activities. Tourism in these rural areas provides job creation and supports these communities and has the ability to continue doing so, providing that enough development is allocated to these areas.

The RLDP vision by 2023 sets out:

"Growth within rural settlements has provided for the needs of residents and supports balanced multigenerational communities that contribute to the vibrancy of the rural area. Through investment in active travel, public transport, and broadband connectivity the rural Vale is a living and working countryside supporting a network of sustainable and thriving rural communities." (Page 44)

It is considered that the above Vision is entirely 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 Key Settlement, Service Centre settlement or Primary Settlements, 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 use of sustainable transport.

Moreover, it is considered that the objective to achieve and realise a 'living and working countryside', whilst also supporting thriving rural communities, is wholly undermined by the overall Strategy, particularly in respect of the location of new growth. Accordingly, it is considered that the current Strategy does not provide for all residents across the Vale, only those within the Strategic Growth Area. This is contrary to Future Wales (Policy 5) which sets out that *"Planning authorities should recognise the challenges facing their rural communities and set out policies to help address them. They should consider the role that housing, employment areas and home-working, health and social services, places of education, emergency services, shops and infrastructure can play in tackling these challenges and in helping create more sustainable places"*. Moreover, it is also contrary to Paragraph 6.50 of the RLDP that states *'it is essential for the LDP to balance the growth in a way that supports the needs of rural communities with the wider sustainability objectives of the plan'*.

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.

Question 4: Strategic Objectives

The ten strategic objectives demonstrate how the RLDP will contribute towards addressing the issues identified within the Vale of Glamorgan. Do you agree with the strategic objectives?

It is not considered that the Objectives set out align with RLDP Vision or the proposed allocations.

Objective 3 'Homes for All' sets out that the Plan will *"... address the identified accommodation needs of all the Vale's communities through all stages of life"*. As, previously stated, it is unclear how the RLDP will meet this objective, given that no allocations for further development are being included in the rural Vale, and in key settlements such as Bonvilston. Concern is particularly highlighted in regard to the supply of affordable homes in the area, as well as the supply of additional homes to meet the demands of the growing ageing population within the rural Vale.

Objective 7 'Fostering Diverse Vibrant and Connected Communities' sets out that the Plan will *"Provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure"*. However, as set out above, there is no growth allocated in Bonvilston, which means that this objective is unlikely to be met. Through focusing development solely in locations that are already well served by existing and proposed rail stations as part of the South Wales Metro, this does not support investment (through housing and employment) in rural areas, therefore not meeting Objective 7. It is imperative that the rural settlements are not left behind, as a result of lack of focus and investment - to ensure that appropriate growth is apportioned to these areas and local needs are met – both in terms of providing housing and employment opportunities.

Objective 8 'Promoting Active Travel and Sustainable Travel Choices' states that the Plan will *'Ensure new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport'*. Objective 8 could be met and achieved through the allocation of housing within the rural Vale, namely, site allocation 435 – given that it is so well served by existing bus and active travel routes, that are only to be improved. However, the allocations have neglected the sustainability credentials of these areas, and have directed growth to areas that have access to rail facilities. The Objective makes reference to locations that are well served by a range of transport, including walking, cycling and public transport. Notwithstanding this, locations that are considered not to be in close proximity to rail services have been discounted/are not provided for. Accordingly, it is considered that the extent of Objective 8, and therefore the strategic objectives of the Vale, could be met more appropriately through provision of housing allocations within the Rural Vale.

In assessing the achievability of the above objectives, it is clear that each objective has the potential to be met through the delivery of site allocation 435, and other similar sites within the rural Vale.

Question 5: Spatial Strategy Options – The Council has considered four strategic options for where new development over the Plan period should be located. Do you agree with the 'Sustainable Transport Orientated Growth Option' as the basis of the spatial element of the Preferred Strategy?

It is our view that the 'Sustainable Transport Orientated Growth Option' should not form the basis of the spatial element of the Preferred Strategy.

The Growth Options that the Preferred Strategy presents have been rigorously and robustly considered and appraised, to determine which option should be pursued. We consider Option 2 (Dispersed Growth) to be the most optimal in meeting the identified objectives, facilitating unmet housing, and fulfilling the Vale of Glamorgan's role as being complimentary to Cardiff as the centre of the Strategic Growth Area.

Our reasons for this are set out below.

As set out in the Spatial Strategy Option Paper (June 2023), Option 2 sets out a plan for development that would be dispersed across the Vale, proportionate to the size of each respective settlement. Option 2 sets out a comprehensive sustainable and viable option that would disburse growth across the Vale in an equitable growth strategy. Option 2 seeks to ensure that all sustainable settlements in the Vale benefit from much-needed growth, in order to provide for housing and employment opportunities.

The Preferred Strategy notes that the Vale is to not be competitive with Cardiff, disbursed growth enables growth to happen without competitiveness occurring. The Housing and Employment Growth Options Paper (September 2023) notes that trends over the past 5 years have seen a high level of migration from Cardiff to the Vale of Glamorgan. The competitiveness between the Vale of Glamorgan and Cardiff is therefore evidenced as increasing. Option 4, which pursues growth predominately along the Vale of Glamorgan railway line (which lies predominately in the southern and eastern areas of the Vale) sustainable transport in way for people to live in the Vale and work in Cardiff.

The Vale of Glamorgan as of 2021 (Housing and Economic Growth Options Paper September 2023), was the third worst Local Authority in Southeast Wales for the percentage of people who live in the area as a percentage of the Total Employed percent. The Vale of Glamorgan only has 55.9% of the county's working population working within the county. Option 4 promotes for this percentage to decrease, and for the 26,800 out-commuters to increase - as it focuses on development around the southern railway line that connects directly to Cardiff. There needs to be a greater initiative on retaining workers within the Vale, by providing better sustainable connections between settlements and areas of employment, in order to support and enhance local businesses. This is particularly the case in respect of the rural economy.

Paragraph 5.4 of the Strategy confirms that *"the four alternative spatial options are all considered to be realistic..."*. This therefore confirms that the Council considers Option 2 as a realistic spatial approach, and is achievable. Indeed, it is the approach taken by the current LDP – which has seen the successful delivery of sites and housing.

The current Growth Option would result in an overly high reliance on development in the largest of the settlements in the Vale. Locating growth here would limit opportunities for growth elsewhere in the Vale whilst putting an unnecessary pressure on the existing facilities and infrastructure in these settlements. This was outlined as a disadvantage in the Spatial Strategy Options (June 2023). Further to this, there are a number of already allocated sites in the current LDP located within the largest settlements of the Vale that have yet to come forward, for various reasons. The revised Plan looks to further allocate to these areas that are evidenced to be inefficient in the delivery of housing. By comparison, those parts of the Vale which have "performed" in delivering housing (the rural Vale, for

example) are discounted and are not provided for in terms of housing allocations. This is in conflict to the objectives set out in Future Wales for Vibrant Rural Areas (Policy 5) which states *"Strategic and Local Development Plans must develop policies that support rural areas. Where these plans identify growth in rural areas, it must be appropriate and proportionate to the needs of the settlement and the wider rural area they serve"*.

Growth Option 2 would allow for investment and opportunities within the other settlements such as Bonvilston, that is considered beneficial in supporting the existing community but also facilitating further investment, prospects and growth outside of areas which have already seen a level of development and are already inherently sustainable. This has already been seen in Bonvilston with the recent approval of 120 homes under application ref. 2015/00960/FUL, which was deemed by the council be a sustainable location for housing.

Furthermore, the dispersed growth option identifies that Bonvilston could capably accommodate 0.5% of the total future growth, should this spatial strategy of even growth distribution be taken forward. Whilst this may be seen as a low figure in the context of all settlements, it is relative to the size of the Bonvilston and high when compared to other 'minor' rural settlements.

The Spatial Strategy Options Paper outlines positives and drawbacks of each of the Growth Options. The disadvantages listed for Option 2 are considered to be arbitrary, on the basis that they can be loosely applied to each individual strategy. Moreover, the adverse findings in respect to this Option are entirely contradictory to the strategy of the current adopted Development Plan – which has seen the delivery of housing on many sites. For example, the apparent disadvantage of *'There may not be available sites within each of the settlements identified.'* is not an issue in the context of Bonvilston, given that site allocation 435 and others within and around the settlement are being promoted for development as part of the RLDP. The development of Bonvilston would also not be contrary to Future Wales, as whilst it may not be situated within the first phase of proposed metro routes, it has good access to sustainable transport in the form of bus routes, as previously mentioned in this document, to provide appropriate links to the future transport service.

Further to the above, the advantages of Growth Option 4, most notably allowing modal shift reducing the reliance on private cars, can be applied to the other Growth Options but have failed to be listed as an advantage within their respective assessments. For example, the presence of sustainable transport networks in Bonvilston would allow for a modal shift away from the car. Accordingly, the assessment of each of the Growth Options are deemed to all point toward Option 4 as the most appropriate Growth Option, as opposed to assessing each option objectively and accurately on their individual merits.

In reviewing Growth Option 4 in more detail, it is not considered that it will achieve and deliver the Vision and Objectives over the plan period (in conflict with the Para 5.1 of the Strategy).

Moreover, a Strategic Growth Area has been identified as part of Growth Option 4 (Figure 12: Page 62). The growth area has been determined by the locations of the largest settlements, the train route, and the proximity of these to Cardiff. Paragraph 6.36 of the PS states:

"The Strategy seeks to promote development in the Strategic Growth Area, an area that accommodates the main centres of population and urban settlements that are served by a range of facilities and services and are accessible by a range of transport modes. Within the Strategic Growth Area, Barry as a key settlement, and the service centre settlements of Llantwit Major, Penarth and Cowbridge, provide opportunities for sustainable growth. The primary settlements of Sully, Dinas Powys, Llandough (Penarth), Rhose and St Athan have also been included within the Strategic Growth Area, as these are sustainable locations where new residential development can be aligned with other uses and where there are current and proposed sustainable transport options to reduce the need to travel by car".

However, this proposed 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. This is not in accord with Policy 5 of Future Wales which states "*The Welsh Government wants vibrant rural areas with services to meet the needs of those living there in a sustainable way. Strategic and Local Development Plans must develop policies that support rural areas*". The Growth Option is too heavily reliant on railway 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. The delivery and soundness of the Plan is therefore questioned.

Affordable Housing Provision and Older Person's Housing

The Older Person's Housing Strategy identifies there is a clear and identified ageing population in the rural Vale, not just centrally in and around Barry. Bonvilston is situated in proximity to Cowbridge, a principal settlement within the Western Vale. The strategy identifies the following recommendations for development in the Western Vale on page 23:

- *The council will enable the development of c.160 units by 2037 of new contemporary housing suited to older people, including 'care ready' retirement housing, including homes for social rent and for sale (depending on location).*
- *The council will enable the development of c.140 units by 2037 of additional extra care housing, including homes for social rent and for sale (depending on location).*
- *The council will use planning policy to encourage private and social housing providers to develop a range of mainstream housing that is suited and attractive to older people.*

Policy SP8: Affordable and Specialist Housing sets out that a minimum of 2,000 affordable homes are needed over the Plan period, whilst identifying that this needs to include Older Person's Housing: "*In meeting this target, the plan will ensure that new housing developments provide for a mix of housing tenures, types, and sizes of homes, including specialist accommodation to meet the needs for residents with care needs and an ageing population, in accordance with the Council's latest Local Housing Market Assessment and Older Persons Housing Strategy*".

Policy SP2: Settlement Hierarchy states "*For the purposes of this policy small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in minor rural settlements or up to 50 dwellings in primary settlements. The type, scale and*

mix of affordable housing will be expected to reflect the latest evidence, including specialist older person housing. Proposals which do not meet the minimum 50% affordable housing provision will not be supported”.

Given that there are no allocations included in Bonvilston, it is not considered that the Preferred strategy adequately addresses the identified need in the area for affordable housing, or the supply of housing to meet the growing ageing population. It is therefore considered that Site Allocation 435 – Land South of the A48, Bonvilston, could support a provision of affordable housing through this policy, for a small scale, affordable led housing development in a rural settlement. The provision of affordable housing in this location would considerably help to deliver an unmet need for local residents, particularly given that the Vale of Glamorgan is one of the more expensive areas to live in Wales. As such, the provision of affordable housing in the rural Vale will ensure that the County retains its population, both the younger populations (i.e. workforce) and also providing specialised accommodation for the elderly population. The site is also level and within short walking distance of bus stops, as well as the village shop and pub, making this an ideal location for older persons.

Question 6: Growth Options – a) Do you agree with the preferred housing growth option, the 'Dwelling-led 10-year scenario' which sets out a housing requirement of 7,890 dwellings over the plan period (526 dwellings per annum)?

We consider that the 'Dwelling-led 10-year scenario' is generally agreeable in terms of the overall level of growth provision, however, we have concerns with the distribution of growth and reliability of sites coming forward.

First of all, of the 7,890 dwellings identified, 1,710 are 'rolled forward' sites from the previous LDP adopted in 2017. These are sites that have not been built out, and many of which have not yet secured planning permission some 7 years on. This includes the strategic housing allocation for 250 units at Land at Church Farm, St. Athan, which now forms part of the larger site being promoted within the revised LDP.

Of the 'rolled forward' sites, all but one lie within the proposed Strategic Growth Corridor. This clearly demonstrates the lack of reliability for these sites to yield and deliver units, given the significant time elapsed, and moreover brings into question the likelihood and probability of new allocations being delivered within this area. This is particularly concerning, given that the previous allocations are being relied on to make up a shortfall in overall numbers.

Likewise, of the sites with planning permission included within the existing land supply and within the Strategic Growth Corridor, 1,046 units of the 2,536 identified have not been started as of April 2023. This is over 40% of the total capacity of the existing land supply, which is overdue for development.

In comparison, many of the sites allocated within the rural vale have been built out or are under construction – including the Land to the east of Bonvilston, Land to the rear of St. Davids Primary School, and Land off St. Brides Road, Wick. All of these sites have secured planning permission and have yielded a large number of units within the plan period. This indicates and evidences the reliability of sites in 'Minor Rural Settlements' delivering housing, should they be allocated.

Overall, whilst the total number of units is reasonable, we believe that a greater level of growth is achievable and should be considered, given the lack of reliability of sites within the proposed growth area to date. To facilitate this, it is considered that more growth should be allocated to the rural Vale where sites such as the Land South of the A48, Bonvilston can assist in achieving this growth in areas which have already been considered sustainable and proven to yield.

In short, the current strategy of the Plan seeks to allocate more sites in locations which are already well provided for in terms of rolled forward allocations and commitments, whilst making no provisions for locations that have a proven track record in delivering housing. It is clear that the strategy ignores deliverable locations and over burdens locations which not yielded to their full extent.

Question 7: Preferred Strategy

Section 6 sets out the RLDP Preferred Strategy for the Vale of Glamorgan, comprising six key elements and includes the Preferred Strategy Key Diagram. Do you agree that the Preferred Strategy is appropriate for the Vale of Glamorgan?

We do not agree that the Preferred Strategy is appropriate for the Vale of Glamorgan. The key elements of the RLDP Preferred Strategy that are considered inappropriate are listed and expanded on below.

1. Delivering a sustainable level of housing and employment growth to accord with the Vale's position within the Cardiff Capital Region

As outlined above under question 6, whilst the overall level of growth is generally agreeable, we have concerns with the reliability of the sites allocated given their track record, particularly given the number of units from previous allocations that have not yet been built out. As these fall within the proposed 'Strategic Growth Corridor' where it has been evidenced that sites have not yielded in the past, we believe it is crucial that additional sites are considered in more proven areas such as the rural Vale, where existing allocations have consistently yielded a significant number of units over the previous plan. This will more reliably support the Vale's position within the Cardiff Capital Region.

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

As set out above, whilst the principle of sustainable travel is supported, we do not agree that the Strategy provides for new development and investment in more rural locations.

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 do nothing 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 railway as the key sustainable transport method, whereas there are bus services and other active travel options which should also be properly assessed and focused on in terms of promoting sustainable development. The delivery and soundness of the Plan is therefore questioned.

As already highlighted, the Strategy identifies that there is a high percentage of home working in the rural Vale. Paragraph 3.33 states that *"34% of workforce work from home either part time or full time"*. As such, it is considered that any lack of sustainable transport options for rural Vale settlements such as Bonvilston are unfounded given that a large proportion of people working do not commute for work. This is also supported through Policy 5 of Future Wales which states: *"The increasing ability to work from home and remotely from main offices may result in higher demand to live in rural areas and opportunities to retain the working age population. This could bring positive impacts for rural enterprises and the foundational economy"*. Furthermore, as mentioned above under question 3 Bonvilston has good sustainable transport links in the form of a frequent bus service – the X2 Cymru Clipper which facilitates travel to places of work.

In addition, the Strategy confirms that the Vale contributes to the tourism sector (Paragraph 3.40) which supports and provides economic benefits. It is considered that the rural Vale plays a significant part in providing a level of tourism for the Vale as a whole, with numbers of day visitors going back to pre-pandemic numbers in 2021. Tourism in these rural areas provides job creation and supports these communities and has the ability to continue doing so, providing that enough development is allocated to these areas.

The current Growth Option would result in an overly high reliance on development in the largest of the settlements in the Vale. Locating growth here would limit opportunities for growth elsewhere in

the Vale whilst putting an unnecessary pressure on the existing facilities and infrastructure in these settlements.

3. Focusing development in 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 includes an over reliance on the railway network for allocating development, when there are sufficient bus services and other active travel options and facilities in the Vale which support more rural locations.

In respect of Bonvilston, the bus service 'Cymru Clipper' provides a regular bus service from Porthcawl to Cardiff which runs along the A48 and through many of the more rural settlements in the Vale. There is a lack of acknowledgement for these appropriate sustainable transport links which provide appropriate methods of transportation for people who live and work in areas outside of the Strategic Growth Zone. It is considered that the availability of bus services and other active travel options should be considered in more detail and with more weight attached to it (reference made back to Question 1).

By way of evidencing, the flawed reliance on rail services, St Athan has been identified as a location for Sustainable Growth, yet there is no railway station yet in place. The feasibility study '*St Athan Railway Station*' proposes four potential locations for the siting of the railway station, with no definitive location provided. The Pre-Deposit Engagement Report states that '*discussions are being held with Transport for Wales and the Cardiff Capital Region regarding a possible new rail station in St Athan. This would be supported with critical mass development in the area.*' It is considered that the Plan is not sound in regards to allocating further development in St Athan, given that there is no evidence that the new train station will come forward (in the Plan period / at all). The provision of a station is only at feasibility stage, and its provision is described as "possible". This would result in a major issue for the Plan if this provision did not come forward, given that the Strategy is centred around the Sustainable Transport Growth Option.

In order for a Plan to be "sound" it has to be deliverable. By association, the sites allocated within the Plan need to be deliverable, as does any infrastructure on which they are based and will be reliant. The Strategy has to be in question accordingly, given that major allocations are proposed based on possible feasible infrastructure provision.

In addition, it is clear that the community has not been involved nor is confident in the delivery of such new infrastructure. For example, and as stated on the St. Athan Community Council website regarding the Preferred Strategy, '*at no point has the VoG Council talked to Council to ask us our opinions prior to this proposal. There has been no "Placemaking" conducted in St. Athan.*' They have also raised concerns with the quantum of development proposed for St. Athan stating '*These two developments will add some 1400 houses to our Community, with little improvement to the infrastructure to support them.*' Given this, it could be argued that the current strategy with such a heavy focus on large 'key sites' is not well received by the community and does not reinforce positive engagement within settlements.

Paragraph 6.21 clearly states that Cowbridge is identified as a sustainable location and '*whilst not on the train line, it does have good bus links to other settlements in the Vale, as well as Cardiff and Bridgend*'. However, Policy SP4 sets out only two sites (SP4 L2 and SP4 L3) with a total allocation of 411 dwellings in this location. Even so, these sites are existing sites (allocations and commitments) as opposed to new additional sites. This is somewhat comparative with the Primary Settlement of Rhoose where 450 homes are proposed but provides far less than St Athan where the combination of key sites 4 and 5, means over 1,000 dwellings are proposed. Moreover, the reference to 'good bus links' therefore shows support for this sustainable method of transport, and this should be considered

when looking at other sites in sustainable settlements that benefit from good bus links, such as Bonvilston.

4. Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement.

Paragraph 6.23 advocates the critical need for, and the importance of affordable housing as this will to retain younger and working aged people within their communities. Site allocation 435 – Land South of the A48, Bonvilston can assist not only in achieving greater affordable housing provision (with 40% of units being either social or intermediate rent), but also in providing cheaper market housing with a number of smaller 2 and 3-bed properties which would be more obtainable than the large 4-bed detached units, seen widely across the village.

Paragraph 6.24 advocates for the delivery of affordable homes within areas such as Bonvilston, stating: *'As a consequence, a key part of the strategy is to allow for affordable housing led developments within those 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 with the actual number of dwellings will be dependent on the local context. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable'*. Reference is also made to the suitability of site allocation 435 for future consideration against Policy SP3, namely, additional new housing allocations including affordable led developments.

5. Supporting the role of Cardiff airport as a strategic gateway for international connectivity.

Lastly, paragraph 6.27 of the Preferred Strategy makes reference to the 'Cardiff Airport and Gateway Development Zone'. The application for the southern site at Model Farm was refused planning permission, and is under review by Welsh Ministers, after its appeal was forwarded on by the Planning Inspectorate. This raises significant concerns in terms of the reliability of its delivery, as the site is not certain to come forward. The site comprises the development zone against which housing provision is justified and made. Ultimately the uncertainty over this proposal risks a significant proportion of the employment land identified by the current Preferred Strategy not being fulfilled.

The overreliance and disproportionate weight afforded to Cardiff Wales Airport has been set out earlier – with the view expressed that this has no role to play in defining housing provision at the local (Vale) level.

Question 8: Key Sites

The five key residential led sites identified in the Preferred Strategy will help meet the housing requirement over the Plan period. Do you agree with the five key sites identified?

We do not agree with the suitability of the five key sites identified.

The Preferred Strategy seeks to allocate a key site in Barry (Key Settlement), with all other sites located in Primary Settlements (Dinas Powys, Rhoose and in St Athan).

The sites allocated within 'Service Centre Settlements' for a number of these Settlements (i.e. Cowbridge, Llantwit Major, Llandough, Rhoose Sully) are simply 'rolled forward' from the adopted LDP or are awaiting determination or subject to signing s.106 agreements. Accordingly, there are currently 2,589 dwellings which are at risk of not coming forward. The Settlement Appraisal document sets out in Paragraph 3.4 that: *'Although the historic towns of Cowbridge, Penarth and Llantwit Major are all very different in character, they have similar roles and functions. For example, they all have significant resident populations, provide local employment opportunities and have established town centres, are generally well served in terms of public transport provision, and provide a wide range of cultural, educational and community services and facilities. It is for these reasons, that the existing adopted LDP identifies these as 'Service Centre Settlements' in recognition of their role in serving the daily needs of their local residents and acting as important hubs for those living in nearby smaller settlements'*.

Despite this little to no provision is made in such settlements.

Moreover, it is not considered that the Plan fully supports the growth and continued sustainability of the settlements listed as 'Minor Rural' Settlements in the Plan, which is also against the objectives set out in Future Wales (Policy 5). Growth Option 4 does not allow for a suitable disbursement of growth within the Vale which would adequately contribute to the objectives and Aspirations for the Plan for the rural Vale, as evidenced earlier in these representations.

Key Housing-led Site

In regard to the accessibility of allocated key housing-led sites, paragraph 6.63 states that *'These key sites are located in settlements in the highest tiers of the settlement hierarchy'*. As previously set out, the tiers of the settlement hierarchy are considered to be based off relatively biased findings in favour of rail infrastructure, and the clear sustainability credentials of other areas and settlements within the rural Vale should not be discounted. Further to this, the paragraph states that the key sites are all within a 20-minute walk or cycle to existing or proposed rail stations. Firstly, it should be noted that these are two different forms of transport. This brings into question the distance travelled over time perspective. Secondly, whilst Land at North-East Barry (KS1) is approximately a 10-minute cycle away, it is at least a 25-minute walk to the nearest train station at Cadoxton, and many parts of the site would be more than a 30-minute walk. This is of course not representative of all abilities, as in regard to walking, the Welsh Government's Active Travel Act 2021 states: *"Walking is most suitable for journeys of less than two miles"*. Accordingly, the statement is misleading and shows bias towards the allocation of this site – which is clearly isolated and divorced from existing built form and a/the settlement.

In addition, it is noted that the site is being promoted on behalf of a number of landowners, and as evidenced across South Wales where there are multiple landowners involved in the promotion of strategic sites, the delivery of such sites face greater challenges. Evidence of this can be drawn from key sites, particularly in Cardiff and Swansea, and as such, it is considered disadvantageous in the delivery of this site that there are multiple landowners.

The 'soundness' of any key site, and by association, the Plan itself, is determined upon the deliverability of the site within the Plan period. With multiple landowners involved, it poses a constraint to the overall deliverability of the site, given that the process is more likely to face implications resulting from various parties being involved.

As a result, this undermines the overall integrity of the allocation, in its ability to deliver the currently envisaged 900 units within the Plan period. The delay in any development coming forward on the site within the Plan period will have consequences on the Plan as a whole, in terms of housing delivery and meeting the identified housing need (both market and affordable).

Given the above, it is considered that the deliverability of the Barry key site is questionable, for the above reasons, and therefore, other options for allocations should be explored elsewhere.

Furthermore, paragraph 6.69 states: *'These key sites are located in settlements in the highest tiers of the settlement hierarchy'*. It is considered that there is a too heavy a reliance on the highest tiers of settlements, not least as existing commitments in the LDP are heavily located in the key settlements. A total amount of 1,710 dwellings have been 'rolled forward LDP sites' which accounts for over 21% of the overall housing requirement of 7,890 dwellings (as set out in Policy SP3). These sites have experienced delays in coming forward to date, and the RLDP looks to further allocate the majority of new supply to these areas that are evidenced to be inefficient in the delivery of housing. This can be described as an example of market failure.

Question 9: Strategic Policies

The strategic policies in the Preferred Strategy form the framework for implementing and delivering the identified objectives. Do you agree with the strategic policies?

We do not agree with some of the Strategic Policies proposed, for many of the reasons explained and set out in this representation.

The following submissions are not necessarily exhaustive in respect to all of the Strategic policies within the Plan, albeit those which are most directly relevant to the submissions and objections to the Strategy set out in these representations.

SP1 – Growth Strategy

'The primary focus of housing and employment growth within the Vale shall be within the Strategic Growth Area'.

The Strategic Growth area does not allocate housing toward the rural Vale, which is considered deficient. This is contrary to paragraph 6.50 of the RLDP that states *'it is essential for the LDP to balance the growth in a way that supports the needs of rural communities with the wider sustainability objectives of the plan'*. It is also considered that this strategy is in conflict with Policy 5 of Future Wales which states *"The Welsh Government wants vibrant rural areas with services to meet the needs of those living there in a sustainable way. Strategic and Local Development Plans must develop policies that support rural areas"*.

In regard to rural growth, Policy SP1 states: *'In rural areas, additional growth will be permitted within existing settlement boundaries and on affordable housing led schemes in sustainable locations'*.

Although this is not considered entirely favourable, - in that we consider that general housing allocations ought to be made outside of the defined Strategic Growth Area, site allocation 435 - Land South of the A48, Bonvilston is considered inherently sustainable to yield future development. This has been verified through the recent approvals of housing schemes within Bonvilston, most notably application ref. 2015/00960/FUL for up to 120 units.

SP2 – Settlement Hierarchy

Policy SP2 identifies Bonvilston as a 'Minor Rural Settlement' which lies outside of the strategic growth area. Given this, the current Preferred Strategy does not provide for any growth in the settlement by default, although it is noted that schemes providing at least 50% affordable housing will be considered in Minor Rural Settlements.

As outlined under our response to question 6, we do not consider that the proposal to only allocate sites within the strategic growth area is appropriate, given the lack of yield over the previous plan period from such areas, and given the role and performance of other areas in successfully delivering the current (adopted) Plan's, housing needs.

A significant proportion of units (1,710) have been rolled forward from the adopted LDP. The majority of those within the strategic growth area have not yet secured planning permission. Adding growth to these would only serve to 'saturate' the settlements further, which are already well provided for in terms of potential growth. This is exaggerated by the fact that over 1,000 units of the existing land supply in Key, Service Centre, and Primary Settlements have not yet been delivered – a figure which represents over 40% of the total existing land supply.

SP3 – Housing Requirement

Whilst the overall housing requirement is generally agreeable, the strategy for the distribution of this quantity of growth is not. As explained and evidenced in these submissions, the proposed allocation of sites within the strategic growth corridor has proved to be unreliable, with a large proportion of sites and units not delivering – 7 years on from the point of being allocated within the adopted LDP, and some 12 years on from the previous Deposit Plan.

As such, it is considered prudent and necessary to allocate additional sites within and around smaller settlements within the Vale, as this will safeguard the overall level of housing provision within the Vale. To do so would be to apportion growth to areas which have not only been proven to deliver housing, but which have also been considered by the LPA to be sustainable in the past. This will not only provide a more equal and measured distribution of growth, but also allow future generations to continue to live in the communities they've grown up in as opposed to moving away.

SP4 – Key Housing-led Sites

It is acknowledged that growth is required within the key settlements identified under policy SP4, however, the proportions allocated does not provide for rural communities which make up a large part of the Vale of Glamorgan. The same can be said for the committed and rolled forward sites under policy SP4 as none of these are in the rural Vale. Given this, we do not agree with Policy SP4 as the lack of distribution prevents growth in communities with a clear and established need for homes, particularly at an affordable level. This is the case for Bonvilston where average house sales are over £600,000 and there is an evidenced need for smaller and more affordable homes.

In addition, it has been acknowledged that growth should be balanced to support all communities, in line with the objectives set out in Future Wales (Policy 5). For example paragraph 6.50 of the Preferred Strategy states: *'... it is essential for the LDP to balance the growth in a way that supports the needs of rural communities with the wider sustainability objectives of the plan, especially in its contribution towards meeting the challenges posed by climate change'*. As such, the provisions of Policy SP4 are not agreed.

SP7 – Sustainable Transport

It is acknowledged that sustainable transport forms a key part of future development, and the provisions of Policy SP7 are largely agreed. Notwithstanding this, it is considered that the strategy is overly focused on rail travel and links to the South Wales Metro. The current Strategy does not recognise, nor support any improvement of sustainable travel or further investment in settlements with the rural Vale, given that Growth has been apportioned in only the Key, Service Centre and Primary Settlements.

As such, it is considered that greater weight should be given to bus services and other active travel facilities, whereby settlements such as Bonvilston are well served by the Cymru Clipper which provides frequent travel to the key settlements and services of Cowbridge and Culverhouse Cross.

SP8 – Affordable and Specialist Housing

The Older Person's Housing Strategy identifies that there is a significant and defined ageing population which as set out earlier in these submissions is distributed throughout the Vale, (not just centrally in and around Barry). Policy SP8 does not appear to comply with this assessment given that it relies and focuses on the provisions of Strategic Housing Policies SP3 and SP4 (where growth is located and on the Key Sites identified) to deliver specialist housing need over the plan period. These limit provision to the strategic growth corridor which neglects the elderly population or those with assisted living needs in rural settlements where growth is not proposed to be apportioned in the current Preferred Strategy.

In regard to affordable housing, whilst it is acknowledged that smaller sites with 50% or more provision may be considered, beyond the Strategic Growth Area, the mainstay of this supply will come from key sites in the identified Strategic Growth Area. It is therefore considered necessary to apportion sites more evenly across the Plan area. If this change is not agreed, it places much greater emphasis and importance on the identification of sites suited to delivering the planned 50% affordable housing led development opportunities.

For example, the Land South of the A48, Bonvilston, if allocated for general housing would provide 40% affordable housing, thus contributing to the overall need in the county. With an identified need of at least 2,000 affordable homes over the plan period, it is considered that greater weight should be given to additional sites that could yield high proportions of affordable housing, not least as this would safeguard the provision within the plan, should any of the key or rolled forward sites not be delivered, as has been the case previously.

Alternatively, a 50% affordable housing-based allocation at the site would result in even greater affordable housing yield and provision and is an option that the site promoter would be agreeable to.

As set out above, these submissions on some (the key) Strategic policies should not be regarded to be exhaustive, rather the representations set out ought to be evaluated in their entirety to determine whether a consequential change ought to be made to the policies and their provisions. In short, the Strategic policies that relate to the location and distribution of growth, the apportionment of growth relative to the defined settlement hierarchy, and the way that these are considered to address both affordable housing and an ageing population are objected to.

Question 10: Further comments

Do you have any additional comments that you would wish to make of the Preferred Strategy or the supporting documentation?

Yes, please refer to Section 3 overleaf.

SECTION 3. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

The Stage 2 Assessment of the site concluded the following:

'The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area. The site would result in a loss of the either Grade 1 or 2 agricultural land contrary to national policy. Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.'

There are fundamental disagreements with this conclusion. As such we'd outline the following:

The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

The site would result in a loss of the either Grade 1 or 2 agricultural land contrary to national policy.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present.

Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land.

Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility splays could be achieved to enable safe access. As such it is considered that the site would achieve appropriate highway access given the existing points from the A48.

Further commentary on the candidate site assessment at Preferred Strategy Stage is provided overleaf.

Response to the Candidate Site Assessment

ID	435
Site Name	Land South of A48, Bonvilston/Tirri Affordale de or A48, Treshmwn Housing Led
Proposed Use	
Developer interest	
Brownfield/Greenfield Land	
Locally Protected Sites (SINCs Local Nature Reserves)	
Wildlife Corridors, Green Network or Stepping Stones	
Protected or Priority Species	
Agricultural Land Quality	
Minerals Resources	
Green Wedge Designations	
Special Landscape Area and Glamorgan Heritage Coast Designations	
Contaminated Land	
Existing Physical Site Constraints	
Topography and Site Conditions	
Tree Preservation Orders, Hedgerows and Woodlands	
Amenity and Compatibility with adjacent uses	
Environmental & Physical Constraints Conclusions	
Access to Services and Facilities	
Access to Retail	
Access to Primary Schools	
Access to Health Services	
Access to other Community Facilities	
Access to Green open Spaces	
Sustainable Transport - Public Transport	
Sustainable Transport - Active Travel	

Upon review of the above, is noted that the site scored 'red' in the Stage 2 Assessment undertaken by the Council in a number of categories. Those not covered in the response to the Stage 2 Assessment above, will be assessed individually below.

Developer Interest

Whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit it is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

Environmental and Physical Constraints

The site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out in answer to Question 1 of this written statement, the site is within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

Deliverability of the Site

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

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.