



17th October 2025

**fao.** Planning: [ldp@valeofglamorgan.gov.uk](mailto:ldp@valeofglamorgan.gov.uk)

**address.** Vale of Glamorgan Council  
Civic Office  
Barry  
CF63 4RT

Dear Sir / Madam,

**Vale of Glamorgan Replacement Local Development Plan (RLDP)**

**Representations regarding the Housing Trajectory Consultation – ‘Land South of the A48, Bonvilston’ (Site ID – 435 / 3857)**

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 Housing Trajectory Consultation.

Our detailed representations and a rebuttal / response to the Housing Trajectory Stakeholder Consultation are provided below in this letter. Our detailed representations on the Preferred Strategy previously published and consulted on by the Council are included in Appendix A. These should be read in conjunction with this submission. A ‘headline’ summary of these (Preferred Strategy) Representations has been provided below for context.

**These representations**

These representations concern and relate to the consultation in respect to the Housing Trajectory published to document the delivery of the housing supply defined by, and within, with the emerging Plan.

The trajectory is, in turn, underpinned by, and predicated on, sites that are proposed to be allocated. Some of the sites contained within the trajectory have been the subject of objections (by us and others), whilst others are sites that have not been made public, and are being included for the first time.

It is, accordingly, and for the reasons set out and evidenced in these submissions, necessary and appropriate to make comment on these sites. To not do so would assume that the sites forming part of the trajectory are sound and agreed, and by association the trajectory is sound and agreed.

Prior to setting out the detailed response to the trajectory it is considered worthwhile and necessary to remind (in headline terms) of previous submissions made to the plan as a whole in the preceding consultation “round” of the Plan i.e. the Preferred Strategy.

**‘Headline’ Summary of Preferred Strategy Representations**

In short, and to summarise the case made and set out, the Preferred Strategy representations objected to the following:

- the level of growth identified for the Plan period;



- the spatial distribution options chosen to underpin the strategy;
- the Strategic Policies that underpin and seek to define the Strategy;
- 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, was considered to be 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) was considered to be flawed;
- The allocations identified would accordingly 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).

In overall conclusion, the representations to the Preferred Strategy 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".

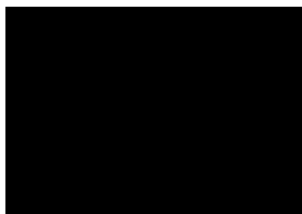
The site, the subject of this representation, has been assessed and evidenced to be readily available, suitable and deliverable (not least as a result of a comprehensive suite of assessment information), and ought accordingly to be considered favourably for allocation as part of any revised Strategy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

### **Summary & Conclusion**

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

We look forward to hearing from you in due course. In the meantime, 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.



## Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

## Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions

## Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

### *Other Housing Allocations*

- Land south of Clive Road, St Athan;

### *Affordable Housing Led Sites*

- Land at Heol Fain, Wick;
- Land west of Maendy Road, Aberthin;
- Land Noth of West Winds Business Park, Fferm Goch; and
- Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3<sup>rd</sup> October 2025) stating *“it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents”*.

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 *“A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information”*. Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

### Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

- *“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*

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of “6 months” given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of 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 (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within “4 months” as indicated.

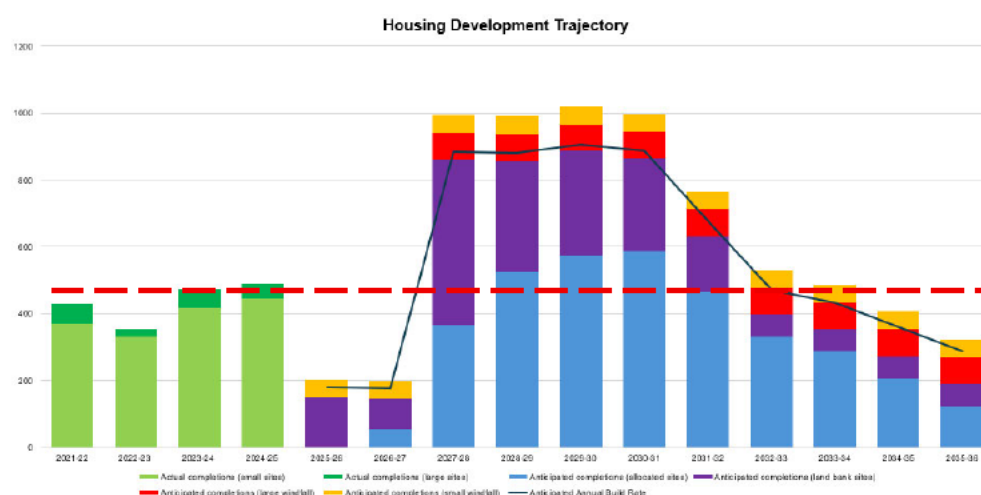
It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore **object** to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

### Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory – which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.



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

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 – as depicted by the green columns). This is considered extremely 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.

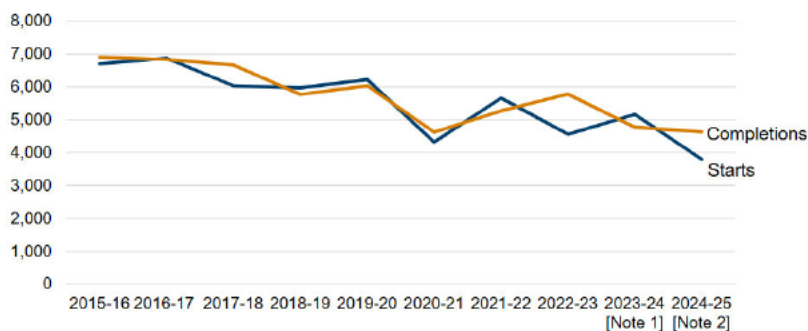
The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 – 2025 has been approx. 400 – 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory 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.

The anticipated delivery of housing also 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 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document '[New House Building: April 2024 to March 2025](#)', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

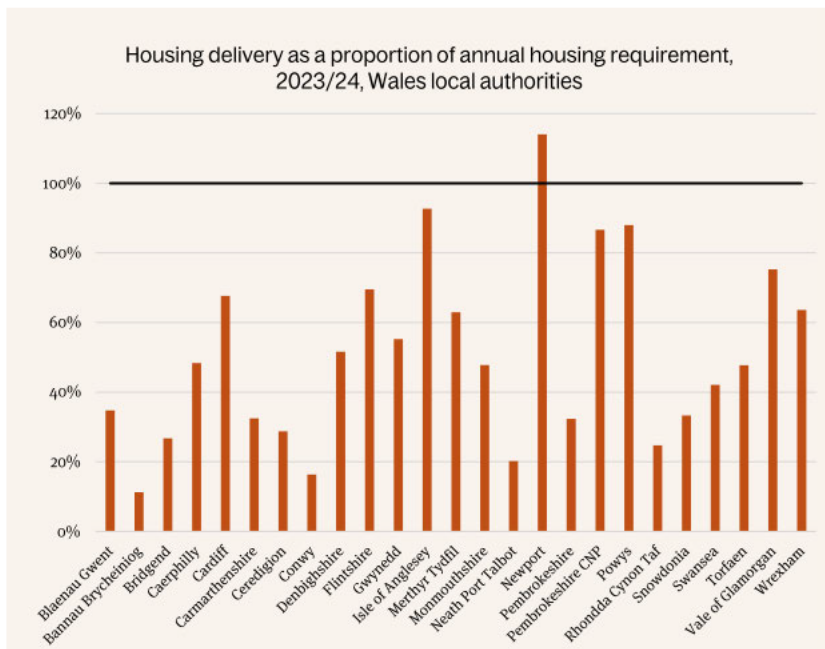
**Figure 1: Number of new dwelling starts and completions, 2015-16 to 2024-25**



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

In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was 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 2, 2025 Report \(September, 2025\)](#) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document '[Increasing Housing Supply in Wales](#)' (4<sup>th</sup> 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

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

- *"A shortfall in numbers entering roles from the education system;*
- *An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;*
- *Challenges attracting a wider talent pipeline into the sector;*
- *A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and*
- *Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".*

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore **object** to the proposed numbers of completion 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. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

### Status & Standing of Sites included in the Trajectory

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:

**Table 6: Existing LDP allocations to be carried forward**

| 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)                                                                             |
|                                                                                        |                | <b>959</b>      |                                                                                                                                          |

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.

On this basis, we would **object** to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

## **Key Sites**

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivering the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period – which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

## **St Athan Train Station**

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, 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' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions 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 these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes 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 a further site 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.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we **object** to the Trajectory in its current form accordingly.

#### Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

## Detailed Comments in respect to 'new' sites

### Other Housing Allocations

#### Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

|                                                                  |                                                                     |
|------------------------------------------------------------------|---------------------------------------------------------------------|
| ID                                                               | 366                                                                 |
| Site Name                                                        | Land South of Clive Road, St Athan/Tir de o Clive Road, Sain Tathan |
| Proposed Use                                                     | Housing                                                             |
| Developer interest                                               |                                                                     |
| Brownfield/Greenfield Land                                       |                                                                     |
| Locally Protected Sites (SINCS and Local Nature Reserves)        |                                                                     |
| Wildlife Corridors, Green Networks 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/GI                                   |                                                                     |
| Sustainable Transport - Public Transport                         |                                                                     |
| Sustainable Transport - Active Travel                            |                                                                     |
| Access/proximity to services and facilities conclusions          |                                                                     |
| Community Facilities                                             |                                                                     |
| Connectivity and Capacity                                        |                                                                     |
| Infrastructure availability conclusions                          |                                                                     |
| Other Infrastructure                                             |                                                                     |
| Highway Accessibility                                            |                                                                     |
| Climate Change                                                   |                                                                     |
| Historic environment                                             |                                                                     |
| Placemaking - Character and Place                                |                                                                     |
| Health & Wellbeing                                               |                                                                     |
| Suitable for further Consideration                               |                                                                     |

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

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 a further site for housing 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.

## Affordable Housing Led Allocations

### Land at Heol Fain, Wick

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

|                                                                  |                                                              |
|------------------------------------------------------------------|--------------------------------------------------------------|
| ID                                                               | 404                                                          |
| Site Name                                                        | Land east of Heol Fain, Wick/Tir<br>dyrain o Heol Fain, Y Wg |
| Proposed Use                                                     | Housing                                                      |
| Developer Interest                                               |                                                              |
| Brownfield/Greenfield Land                                       |                                                              |
| Locally Protected Sites (SINCS and Local Nature Reserves)        |                                                              |
| Wildlife Corridors, Green Networks 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/GI                                   |                                                              |
| Sustainable Transport - Public Transport                         |                                                              |
| Sustainable Transport - Active Travel                            |                                                              |
| Access/proximity to services and facilities conclusions          |                                                              |
| Community Facilities                                             |                                                              |
| Connectivity and Capacity                                        |                                                              |
| Infrastructure availability conclusions                          |                                                              |
| Other Infrastructure                                             |                                                              |
| Highway Accessibility                                            |                                                              |
| Climate Change                                                   |                                                              |
| Historic environment                                             |                                                              |
| Placemaking - Character and Place                                |                                                              |
| Health & Wellbeing                                               |                                                              |
| Suitable for further Consideration                               |                                                              |

| RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) |            |                              |               |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------|------------|------------------------------|---------------|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site ID                                             | Settlement | Site Name                    | Scale of site | Does the site accord with the Preferred Strategy? | Reason                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 404                                                 | Wick       | Land east of Heol Fain, Wick | Medium        | No                                                | Site is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a primary settlement. A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth. |

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

*“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”*

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances – coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmere By Sea.

#### Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

| RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) |            |                                                                |               |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------|------------|----------------------------------------------------------------|---------------|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site ID                                             | Settlement | Site Name                                                      | Scale of site | Does the site accord with the Preferred Strategy? | Reason                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 398                                                 | Fferm Goch | Land to north and west of west winds business park, Fferm Goch | Medium        | No                                                | Site is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a minor rural settlement. A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 25 dwellings. The site adjoins the existing settlement of Fferm Goch and is located between and existing residential area and Westwinds Business Park. |
|                                                     |            |                                                                |               |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

- Access to Retail;
- Access to Health Services;
- Sustainable Transport- Public Transport;
- Access/ Proximity to services and facilities conclusion;
- Climate Change: and



- Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

|                                           |       |                                                                                                                                                                                                                           |
|-------------------------------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sustainable Transport<br>Public Transport | Green | The site is served by public transport connections within 800m walking distance of the site and provides an acceptable minimum frequency of 1 service per hour Mondays to Saturdays plus Sunday service)                  |
|                                           | Amber | The site is of a size that could potentially sustain a commercial public transport connection within 800m walking distance of the site (minimum frequency of 1 service per hour Mondays to Saturdays plus Sunday service) |
|                                           | Red   | The site is not served by public transport connections within 800m of the site and is considered incapable of supporting a frequent service by virtue of its size.                                                        |

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "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."

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

|                                   |       |                                       |
|-----------------------------------|-------|---------------------------------------|
| Access to Services and Facilities | Green | Within 800 m of site (10-minute walk) |
|                                   | Amber | Within 1200m of site (15-minute walk) |
|                                   | Red   | Greater than 1200m (+15-minute walk)  |

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "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 outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy – as it fails to meet several key development goals set out. A "small scale

*affordable housing led development*” which is needed to *“respond to local affordable needs and help sustain services and facilities within these rural communities”* will therefore not be provided for. This is clearly an issue.

### Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

|                                                                  |                                                     |
|------------------------------------------------------------------|-----------------------------------------------------|
| ID                                                               | 453                                                 |
| Site Name                                                        | Land to the East of Colwinston/Tir-dryain o Dreghyn |
| Proposed Use                                                     | Housing                                             |
| Developer Interest                                               |                                                     |
| Brownfield/Greenfield Land                                       |                                                     |
| Locally Protected Sites (SINCS and Local Nature Reserves)        |                                                     |
| Wildlife Corridors, Green Networks 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/GI                                   |                                                     |
| Sustainable Transport - Public Transport                         |                                                     |
| Sustainable Transport - Active Travel                            |                                                     |
| Access/proximity to services and facilities conclusions          |                                                     |
| Community Facilities                                             |                                                     |
| Connectivity and Capacity                                        |                                                     |
| Infrastructure availability conclusions                          |                                                     |
| Other Infrastructure                                             |                                                     |
| Highway Accessibility                                            |                                                     |
| Climate Change                                                   |                                                     |
| Historic environment                                             |                                                     |
| Placemaking - Character and Place                                |                                                     |
| Health & Wellbeing                                               |                                                     |
| Suitable for further Consideration                               |                                                     |

| RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) |            |                                |                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------|------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ID                                                  | Settlement | Site Name                      | Reasons for Rejecting Site                                                                                                                                                                                                                                                                                                                                                   |
| 453                                                 | Colwinston | Land to the East of Colwinston | The site would represent unacceptable intrusion in to the open countryside. The site is located within a minor rural settlement, and the scale of the proposal would be greater than that supported by the preferred growth strategy of the Replacement LDP. The site is also at a scale that could not be considered as a suitable affordable housing led development site. |

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike ‘Land at Heol Fain, Wick’ and ‘Land to north and west of Westwinds Business Park’ it was stated that this site *“could not be considered as a suitable affordable housing led development site”*. Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is “unsound”.

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances – coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

### **Summary of These Representations**

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

