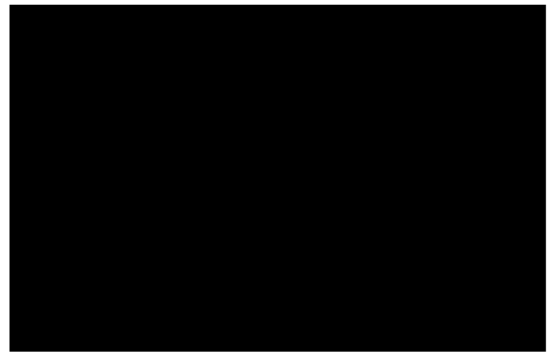




11th March 2026

fao. Planning: 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 Deposit Plan Consultation – 'Land off Millennium Way'

Please find enclosed, on behalf of and under instruction from our client, 'Cadoc Castle Land Developments Ltd, representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

The above site has been submitted as a Candidate Site as part of the Deposit Plan consultation. The following has been submitted as part of this process:

- Candidate Site Submission (including Sustainability Appraisal and Assessment against Candidate Site Methodology);
- Development Viability Model (dated March 2026) completed by Cooke & Arkwright.

Having regard to the above information submitted, and in summary, it is considered that the site should be considered acceptable and appropriate as an employment site allocation, in light of the following conclusions drawn:

- The Sustainability Appraisal completed for the site confirms that the site has a range of positive impacts through its allocation for employment uses, and could assist in achieving the Plan's Sustainability objectives.
- In respect of assessing the site against the Candidate Site Methodology, the site is considered available for development and has a viable prospect of coming forward in the short term, for delivering further employment land in the plan period.
- The site is in an inherent sustainable location with excellent access to key services and facilities, and public transport.
- The development of the site would bring about significant employment opportunities in a range of different sectors.
- The site has limited constraints, given that it is currently brownfield land and doesn't include any high grade agricultural land.
- The redevelopment of the site has the ability to make a positive contribution to placemaking and wellbeing.
- The site has been considered acceptable as an allocation previously by the Council in their assessment of the previously proposed uses (residential and mixed-use) – it is only the covenant that prohibited the residential development of the site.



We consider that the site 'performs' well against the defined assessment criteria and methodology, with no evident insurmountable constraints, obstacles, or failings. It has been demonstrated above that there are no insurmountable constraints to development of the site, which includes the covenant that was previously a key constraint to the delivery of the previously proposed development. The latest proposals overcome this, which in turn, evidences that the re-allocation of the site is deliverable, and in turn, sound. As such, the site should be considered a 'reasonable' option, and should progress to the Stage 3 assessment accordingly.

Given that the site is not currently allocated in the Deposit Plan, we would raise an **objection** to the Plan in its current form, on the basis of the Candidate Site submission. Further details are included below.

Summary of these Deposit Representations

In light of the Candidate Site Submission made by the site promoter, we would suggest that the site should form an employment allocation within the RLDP. As a result, the site promoter looks to raise an **objection** to the Deposit Plan.

Para 5.7 states that the RLDP will make provision for *"An allocation of 182 Ha of employment land across a range of sites to enable 67.8 Ha to be brought forward during the plan period and the delivery of up to 5,338 jobs"*. It is noted that there are currently a total of 8 sites highlighted as employment allocations in Policy SP14 'Employment Growth'. **Policy EM1** also highlights two 'Employment Regeneration Opportunity Areas'.

Although there is no objection raised to the inclusion of the sites already identified within the policy in principle, it is considered that the site should be re-allocated as an employment site, given that the previous concerns regarding deliverability have been overcome (as evidenced in the candidate site submission). As a result, it is considered that the site should be identified within the **Policy EMP3**.

We also **object** to the Council's omission of the site within the settlement boundary of Barry, given that the Employment Supplementary Paper (2025) outlined the following recommendation in respect of the site:

"The site has not been allocated but has been retained as white land within the settlement, offering an opportunity for it to be redevelopment for employment should this be deliverable in the future."

Accordingly, the evidence base undertaken to inform the preparation of the Plan recognises the development potential of the site, and outlines that by retaining the site as white land within the settlement, this allows for an opportunity for the site to be developed for employment purposes in the Plan period.

That said, the Deposit Plan Proposals Map shows the site to be located outside of the settlement boundary. As set out in the Development Plans Manual (2020), the policies and allocations in the LDP should flow from the evidence, rather than it being collected retrospectively.

It is therefore the case that we **object** to the Plan in its current form, as it has failed to follow the recommendations set out in its evidence base, contrary to the provisions of the Development Plans Manual set out above.

The fundamental requirement for a Local Development Plan (LDP) is to be sound, and the Development Plans Manual sets out the statutory and procedural requirements for LDP preparation and the three tests of soundness.

Test 2 relates to whether the plan is appropriate (i.e. is the plan appropriate for the area in light of the evidence). A sub-question to this test is whether the plan is supported by robust, proportionate and credible evidence.

It is considered that the Plan has failed to follow the evidence base that has been undertaken for the Plan preparation process – given that the settlement boundary has not been redrawn around the site in accordance with the recommendations of the Employment Supplementary Paper (2025). The formulation of a Deposit Plan must be underpinned by the evidence base, which includes the settlement boundary.

Accordingly, notwithstanding the proposed re-allocation of the site, in any event, it should be the case that the site is included within the settlement boundary, which would then follow the recommendations of the evidence base which should inform the Deposit Plan.

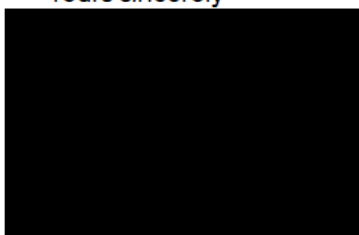
Conclusion

These representations raise objection to the Deposit Plan – for the reasons set out above.

Given the nature of these representations our clients 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.

