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Representor No.

Date Received.....

Date of Acknowledgement

Vale of Glamorgan Replacement Local Development Plan 2021-2036

DEPOSIT PLAN CONSULTATION

Public Consultation Representation Form

The Council is seeking your views on the Replacement Local Development Plan (RLDP) **Deposit Plan**. The Deposit Plan is the next formal stage in the development plan preparation process and expands on the Preferred Strategy which the Council consulted on in December 2023 – February 2024.

The Deposit Plan is the full draft version of the RLDP, detailing the **overall strategy, development policies, land designations** (e.g. conservation) and **specific land allocations** for development (including new housing and employment sites) over the 15-year period 2021-2036.

The public consultation will run for 6 weeks between **Wednesday 28th January 2026 and Wednesday 11th March 2026**. Representations received after this time will not be considered.

Full details of the consultation are available on the Council's website at: www.valeofglamorgan.gov.uk/ldp or by scanning the QR code above.

The Council encourages representations on the Deposit Plan to be made via our **online consultation portal** available at <https://valeofglamorgan.oc2.uk/> however representations submitted using this form will also be accepted.

Representations are welcomed in both Welsh and English and this representation form is available in other formats on request e.g. Welsh, large print.

1: Contact Details

Your / Your Client's Details			Agent's Details (if relevant) *		
Title			Title	Mrs	
Name	Helen Jones Lesley Sungur Philip John		Name	Anna Cheney	
Organisation (If applicable)	None (Landowners)		Organisation (If applicable)	Herbert R Thomas Ltd	
Address	As Agent		Address		
Postcode	As Agent		Postcode		
Email	As Agent		Email		
Telephone No.	As Agent		Telephone No.		
Communication preference: (Please tick)	Email	☐	Communication preference: (Please tick)	Email	☐
	Letter	☐		Letter	☐
Language preference: (Please tick)	English	☐	Language preference: (Please tick)	English	☐
	Welsh	☐		Welsh	☐

**If you are acting as an Agent, please also provide details of person/organisation you are representing (Note: you will need to supply a separate form for each person/organisation you are representing.*

2: Your Views

QUESTION 1:

What are your thoughts on the Deposit RLDP (e.g. policies, site allocations)?

Please state which site reference, policy or paragraph number your comments refer to. If you are commenting on more than one site, policy or paragraph, please use a separate sheet for each one.

SITE REFERENCE/POLICY/PARAGRAPH NUMBER:

Agree/Support	☒	Disagree/Object	☐	Comment	☐	No Comment	☐
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Comments:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).

As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:

- Policy SP1 – Sustainable Growth Strategy
- Policy SP2 – Settlement Hierarchy
- Policy PGD2 – Residential Development Densities
- Policy SP6 – Housing Requirement
- Policy SP7 – Affordable housing provision
- Policy SP8 – Affordable housing requirements
- Policy HG4 – Rural Affordable Housing Sites
- Policy SP13 – Community Infrastructure and planning obligations
- Policy CI1 – Open space provision
- Policy SP16 – Climate change mitigation and adaptation
- Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

- Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
- Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
- Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

To deliver the Sustainable Growth Strategy for the Vale of Glamorgan between 2021 and 2036, the Plan will make provision for the following:

Housing

The delivery of 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. The primary focus of housing growth within the Vale shall be within the Strategic Growth Area as identified on the Key Diagram. New housing developments will be concentrated in the following locations, which are served by existing public transport routes and provide the opportunity to enhance sustainable transport connectivity:

- Barry
- Penarth
- Llantwit Major
- Cowbridge
- Dinas Powys
- Rhoose
- St Athan
- Llandough
- Sully

Outside of the Strategic Growth Area, the allocation of new sites will be limited to small-scale affordable housing led sites in appropriate primary and Minor Rural Settlements.

Employment

Employment sites to deliver the identified employment land requirement of 67.8ha and the delivery of up to 5,338 jobs. New employment development will be focussed on existing Major and Local Employment Sites and Employment Regeneration Opportunity Areas as identified on the Key Diagram.

Infrastructure

Additional infrastructure will be identified to support the scale of growth where required.

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan, the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

The broad distribution of development within the Strategic Growth Area will be shaped by the following hierarchy of settlements, reflecting the role and function of places, and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision.

Strategic Growth Area Settlement Hierarchy:

Key Settlement: Barry.

Barry will remain the focus of future development within the Vale of Glamorgan. As the largest town within the Vale, future growth will support its role as the main administrative town providing good transport connectivity, services, employment and retail and leisure for its residents and wider area.

Service Centre Settlements: Cowbridge, Llantwit Major, Penarth.

These are important settlements that offer a range of services and facilities. Serving the needs of their residents, they also act as important hubs for those living in nearby smaller settlements. Future growth will support this role where the level of development will meet local need of the area.

Primary Settlements: Rhoose, St Athan, Sully, Llandough (Penarth), Dinas Powys.

Development within these settlements will reflect the complimentary role they have in relation to the Key and Service Centre Settlements, transport connectivity and areas of employment.

Areas Outside the Strategic Growth Area:

Primary Settlements: Wenvoe, Wick, Culverhouse Cross

Minor Rural Settlements: Aberthaw, Aberthin, Bonvilston, Colwinston, Corntown, Ewenny, Fferm Goch, Graig Penllyn, Llandcarfan, Llandow, Llanmaes, Llyswoorney, Ogmere-by-Sea, Pendoylan, Penllyn, Peterston-Super-Ely, Sigingstone, St Brides Major, St Nicholas, Treoes, Ystradowen.

The character of the settlements, including their relationship to and setting within the surrounding countryside, will be protected and where possible enhanced. Development in the Primary Settlements that are outside of the Strategic Growth Area as well as the Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.

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.

All settlements listed in the hierarchies, both within and outside the Strategic Growth Area, will be afforded a settlement boundary. All other areas, including smaller rural villages and hamlets, outside of these defined settlement boundaries are regarded as 'countryside' unless specifically identified for other uses in the plan.

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:

'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'. (Paragraph 6.16)

Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:

- The Llangan primary school that sits in the southern portion of the settlement boundary.
- The existing employment site of WestWinds Business Park.
- The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.

These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

On sites of 0.5 Ha or above, residential development proposals within the Key, Service Centre and Primary Settlements will be permitted where the residential density is a minimum of 35 dwellings per net hectare. In Minor Rural Settlements, a minimum residential density of 30 dwellings per net hectare will be required.

Higher net densities will be supported where the development is in a location served by regular public transport and Active Travel routes, or near to services and facilities.

Lower density levels will only be permitted where it can be demonstrated that:

1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area,
2. Reduced densities are required due to significant site constraints or to preserve a natural or historic feature that would contribute to existing or future local amenity; or
3. The proposal is for a mixed-use development where a residential use is the subordinate element of the proposal.

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

To meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036. This will be delivered by:

- 3,837 dwellings from the existing land supply
- 3,520 dwellings on allocated sites
- 1,303 dwellings from large and small windfall developments

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

The residential requirement identified in Policy SP6 is expected to contribute to the established community housing needs of the Vale of Glamorgan by delivering a minimum of 3,070 affordable residential units over the plan period.

In meeting this target, a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation.

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Residential developments (including mixed use schemes) will be required to contribute to addressing affordable housing need and should meet the levels of affordable housing set out below:

Settlements	Affordable Housing Requirement %	Policy Threshold
Barry	30%	5 dwellings net gain
Rhose, St Athan, Llantwit Major	35%	5 dwellings net gain
Penarth, Dinas Powys, Llandough, Sully, Cowbridge	40%	1 dwelling net gain new build. 2 dwelling net gain for conversions of existing buildings
Primary and Minor Rural Settlements outside the strategic growth area	40%	1 dwelling net gain new build. 2 dwelling net gain for conversions of existing buildings
Affordable housing led allocations	50%	As per allocation

The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development.

On sites of 5 dwellings and above, the Council shall require the provision of affordable housing to be provided on site, unless exceptional circumstances are demonstrated, with the requirement being rounded up to the nearest whole number, with the residual amount being provided as an equivalent financial contribution.

In circumstance where an off-site financial contribution is made, the monies received will be used to deliver alternative affordable housing in the Vale of Glamorgan.

Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed.

The exact mix of affordable housing required will be considered on a case-by-case basis having regard to the Council's latest needs evidence at the time of the application.

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability for the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The following sites are allocated as affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing to meet the affordable housing needs of the local community. In addition, the Council will require developers to provide a mix of market housing that will contribute to specific housing market needs of the community

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

Applicants will need to demonstrate how both the market and affordable housing provides for the local housing needs of community in terms of tenure, type and size of dwellings so that a range of housing is delivered to meet the needs of different groups in the local community.

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. This allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Where appropriate and having regard to development viability, the Council will secure new and improved community infrastructure, facilities, and services appropriate to the scale, type, and location of proposed developments using planning obligations. Community infrastructure may include the provision, improvement and long-term maintenance of:

- Affordable and specialist housing.
- Educational provision and facilities.
- Welsh language facilities.
- Transport infrastructure and facilities for pedestrians, cyclists, public transport, and vehicular traffic.
- Public open space.
- Community Growing Spaces such as allotments
- Green infrastructure.
- Public art.
- Leisure, sport, and recreational facilities.
- Biodiversity Enhancement.
- Community facilities.
- Healthcare facilities.
- Service and utilities infrastructure, including digital infrastructure.
- Environmental protection and enhancement such as flood prevention, town centre regeneration, pollution management or historic renovation.
- Recycling and waste management facilities; and
- Employment opportunities and complementary facilities including training and working hubs.
- Mitigation of Severn Estuary Recreational Pressure.

The delivery of new or improved infrastructure must be undertaken in a timely and coordinated manner to meet the needs of existing and planned communities prior to, or from the commencement of, the relevant phases of development.

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that ‘development viability’ is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

All new residential development with a net gain of 10 or more dwellings will be required to provide well-designed, accessible useable open space provision in accordance with the following benchmark open space minimum standards per 1000 population:

- 0.55 Ha of play space (12.4m² per dwelling)
- 2.2 Ha of additional open space including community growing spaces, outdoor sports and informal open space provision (49.8m² per dwelling)

For major commercial developments (1ha or more or a floorspace of 1,000m²), provision should be made of 6m² per full time equivalent employee.

Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision or amenity greenspace.

An Open Space Strategy will be required to be submitted for all housing and commercial developments that meet the thresholds.

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan.

The ‘development viability’ should be recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

All development proposals should address the causes of climate change by:

1. Contributing to decarbonisation and the efficient use of land in their siting, design, construction, mix of uses and, by following placemaking principles;
2. Promoting the principles of a circular economy by prioritising the reuse of existing buildings and the construction of adaptable and durable buildings;
3. Maximising resource efficiency and sustainable construction techniques, including sourcing materials locally;
4. Employing sustainable building design principles, and in the case of new residential development achieving operational net-zero emissions;
5. Maximising the opportunities for carbon sequestration from green infrastructure;
6. Maximising the opportunities for renewable energy development, specifically in local search areas;
7. Promoting the optimisation of energy supply and distribution options, including the provision of district heat networks;
8. Promoting urban shading and cooling through the provision of green infrastructure;
9. Maximising water efficiency and minimise adverse impacts upon quality of water resource; and
10. Directing development away from areas identified as being at risk of flooding and/or coastal erosion and ensure that new development suitably controls surface water run-off through the application of sustainable drainage systems and nature-based solutions

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

Proposals for one or more new dwellings will be required to achieve net-zero carbon operational emissions by:

1. Following the principles of the Energy Hierarchy for Planning, prioritising a reduction in energy demand and improved energy efficiency.
2. Achieving the following standards in individual dwellings as calculated using an identified energy performance model:

From RLDP adoption to 31st March 2030

- i. Space heating demand less than or equal to 40kWh/m²/year;
- ii. Energy use intensity less than or equal to 75kWh/m²/year; and

From 1st April 2030 onwards

- i. Space heating demand less than or equal to 15kWh/m²/year;
 - ii. Energy use intensity less than or equal to 40kWh/m²/year; and
3. Providing on-site renewable electricity generation with an output equivalent to at least the annual energy consumption of the development, as calculated using an energy performance model.

Where the use of onsite renewable energy generation to match total energy consumption is demonstrated to not be technically feasible the following hierarchy should be followed:

- Renewable energy generation should be maximised as much as possible; and/or
- Connection made to an existing or proposed low carbon district energy network (in compliance with Policy CC5); or
- Where this is not possible the residual energy (the amount by which total energy demand exceeds the renewable energy generation) is to be offset by a contribution to the Council's Project Zero fund as far as economic viability allows.

Compliance will be evidenced within an Energy Report.

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.

Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Development proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure provision. To achieve this, development proposals must:

1. Incorporate existing green infrastructure into design, taking advantage of opportunities that are presented by existing and potential assets, through following the principles of placemaking;
2. Protect and enhance connectivity between existing green infrastructure assets.
3. Achieve biodiversity net benefit by employing nature-based solutions, including the Building with Nature Standards, where possible;
4. Protect landscapes designated for their geological, natural, visual, historic or cultural significance;
5. Provide open spaces, including play spaces, amenity greenspace and natural and semi natural greenspace;
6. Facilitate environments that promote mental and physical health and well-being;
7. Provide urban cooling and shading;
8. Integrate green infrastructure provision with sustainable drainage systems; and
9. Support the provision of community growing spaces including allotments and community orchards.

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The ‘development viability’ should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

Biodiversity in the Vale of Glamorgan will be protected, maintained and enhanced. All development proposals must demonstrate how they will contribute to the maintenance and enhancement of biodiversity and the resilience and connectivity of ecosystems. Proposals for new development must:

1. Avoid areas of high ecological value.
2. Be accompanied by an ecological survey and assessment of the likely impacts of the proposal on the biodiversity and ecosystem resilience of the development site. The survey and assessment to be proportionate to the nature and scale of the ecological value of the site and the nature and scale of the proposed development.
3. Demonstrate through the application of the Step-wise approach that there has been an overall net benefit for biodiversity proportionate to the nature and scale of the development.
4. Ensure that International and UK protected species and habitats are protected in accordance with statutory requirements.
5. Protect the integrity of non-statutory locally and regionally designated sites ensuring that they are appropriately protected and managed.
6. Incorporate existing green infrastructure at the early stages of design, that protects and enhances existing site features and improves the connectivity of the ecological network.
7. Be designed to avoid the introduction or spread of invasive non-native species and where necessary, include proposals to eliminate, minimise, reduce and mitigate the impacts of invasive non-native species on biodiversity and ecosystems. Incorporate nature-based solutions within the development to support biodiversity and build ecosystem resilience within the site and the wider area.
8. Make provision for the on-going maintenance and management of existing and newly created nature conservation interests proportionate to the nature and scale of the development.

Where development is considered appropriate and the on-site delivery of nature-based solutions is not feasible or sufficient, planning obligations and/or conditions will be used to secure and maintain compensatory off-site habitats and measures that are functionally related to the assets within the site and contribute to the wider local nature recovery priorities.

The above Policy is in accordance with Chapter 6 PPW.

The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

The following areas are designated as Special Landscape Areas:

1. Castle Upon Alun;

Comment



2. Upper & Lower Thaw Valley;

Comment



3. Ely Valley & ridge slopes;

Comment



4. Nant Llancarfan;

Comment



5. Dyffryn Basin & ridge slopes;

Comment



6. Cwrt-yr-Ala Basin.

Comment



Within the Special Landscape Areas identified above, development proposals will be permitted where it is demonstrated they would cause no unacceptable harm to the important landscape character of the area.

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Please attach additional pages if required.

QUESTION 2: WELSH LANGUAGE

We would like to know your views on the effects that proposals in the Deposit Plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. Do you think that there will be any impacts, either positive or negative? Please explain

Yes	☐	No	☐	Don't know	☐	No Comment	X
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Comments:

Please attach additional pages if required.

IMPORTANT INFORMATION

Thank you for your comments. Following the consultation, the Council will consider the responses and prepare a report of consultation, which will form part of the evidence for the Replacement Local Development Plan.

Completed Representation Forms and any supporting information should be returned to the LDP Team:

BY EMAIL – ldp@valeofglamorgan.gov.uk

ONLINE – By completing the electronic form at <https://valeofglamorgan.oc2.uk/>

BY POST – Planning Policy Team, Vale of Glamorgan Council, Civic Offices, Holton Rd, Barry, CF63 4RU

If you require any further information or have any questions, please contact the LDP Team on 01446 704681 or e mail ldp@valeofglamorgan.gov.uk

Submissions are welcome in either Welsh or English and this representation form is available in other formats on request e.g. Welsh, large print.

How we will use your information

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. A paper copy of the Council's Privacy Notice can be provided upon request or can be viewed at: https://www.valeofglamorgan.gov.uk/en/our_council/Website-Privacy-Notice.aspx

Data Protection Notice – Please note that all comments received cannot be treated as confidential and once duly reported and considered, will be available for public inspection. We will also hold your contact details on our Replacement LDP Consultation Database for the duration of the RLDP preparation process which will keep you informed of future updates. If you would like to be removed from the database at any time and no longer wish to receive correspondence from the Council on the RLDP, then this can be requested in writing. However, any information provided will be stored safely and retained in accordance with Vale of Glamorgan Council's data retention policy unless it needs to be retained under another lawful basis.

REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN

23:55 ON WEDNESDAY 11th MARCH 2026

REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Signed:		Date:	10/3/2026
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