

VALE OF GLAMORGAN  
REPLACEMENT LOCAL DEVELOPMENT PLAN  
2021 - 2036

# HOUSING LAND SUPPLY AND HOUSING TRAJECTORY

December 2025



BACKGROUND PAPER - BP9A



## Executive Summary

- i. This paper is one of a series produced by the Vale of Glamorgan as part of the evidence base for the Deposit Replacement Local Development Plan (RLDP) 2021-2036. Each topic paper can be read in isolation or together to gain a wider understanding of how the policies and/or allocations in the RLDP have been developed to address issues facing the Vale of Glamorgan.
- ii. The purpose of this paper is to identify the contribution that the existing housing land supply within the Vale of Glamorgan shall make towards the delivery of the housing requirement of the RLDP of 7,890 dwellings.
- iii. This paper updates the Housing Land Supply Paper, which was prepared to support the RLDP Preferred Strategy, which assessed that land supply as of a 1<sup>st</sup> April 2023 base date.
- iv. To meet the housing requirement, the Council has undertaken an assessment of the various sources of housing supply that will contribute to meeting this identified provision. The Paper identifies the following provision:
  - 1,747 dwellings have been completed within the authority since between April 1<sup>st</sup> 2021 and the March 31<sup>st</sup> 2025 (i.e. since the start of the RLDP period)
  - There were 313 dwellings on large sites under construction on April 1<sup>st</sup> 2025.
  - 1,860 dwellings have extant planning permissions or where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement. However, when a non-delivery allowance has been factored in, the plan assumes the delivery of 1,777 units on sites with a planning application or subject to Section 106.
  - 959 dwellings will be provided on existing LDP sites that will be rolled forward into the RLDP, and
  - 1,303 dwellings will be delivered on large and small windfall developments (i.e. unallocated housing developments) over the lifetime of the RLDP.
  - Key housing sites will provide 2,278 dwellings to meet the overall housing requirements.
  - Affordable housing led sites will provide 122 dwellings.
  - A further 161 units will be provided on other housing allocations.
- v. The paper provides details on each source of housing towards meeting the 7,890 dwelling plus flexibility requirement.
- vi. The paper also provides commentary on the RLDPs affordable housing contribution over the plan period and identifies the various sources of housing will contribution 3,070 affordable homes.
- vii. Finally, the paper sets out the housing trajectory for the delivery of housing over the plan period. This identified the anticipated annual rate of housing that will be delivered from each of the source of housing identified and shall be a key mechanism for monitoring of the plans performance annually.

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## 1 Introduction

- 1.1 This topic paper is one of a series produced by the Vale of Glamorgan as part of the evidence base for the Replacement Deposit Local Development Plan (RLDP) 2021-2036. Each topic paper can be read in isolation or together to gain a wider understanding of how the policies and/or allocations in the RLDP have been developed to address issues facing the Vale of Glamorgan.

### Purpose of the Background Paper

- 1.2 The purpose of this paper is to identify the amount of additional land the Council will be required to allocate for housing in the Vale of Glamorgan RLDP necessary to meet a housing requirement of **7,890 dwellings**.
- 1.3 The estimated housing requirement identified within the Preferred Strategy is based on the housing requirement of 7,890 dwellings plus an appropriate flexibility allowance to safeguard against sites not being brought forward.
- 1.4 In considering the amount of additional land required the paper examines the various components that will contribute towards the housing land supply for the plan period and follows the methodology for calculating the necessary supply as detailed within the Welsh Government 'Development Plans Manual: Edition 3', March 2020 (DPM).
- 1.5 This involves scrutinising existing land bank commitments and trend based small and large windfall site completions expected over the RLDP plan period. This paper therefore duly considers each component in order to determine the remaining dwelling requirement to inform the Replacement LDP.

### Updates since Preferred Strategy

- 1.6 A Housing Land Supply paper was published alongside the RLDP Preferred Strategy consultation in December 2023, which included the land supply position as of 1<sup>st</sup> April 2023. Since this paper was produced, there have been a number of changes to the figures reflecting additional completions on large and small sites, units under construction and new sites that have been granted planning permission or are now subject to planning applications. In light of this it has been necessary to bring the land supply position up to date so that it reflects the findings of the last housing monitoring based on 1<sup>st</sup> April 2025, unless otherwise specified.
- 1.7 In addition, there has been a change to one of the five key sites that was consulted on as part of the Preferred Strategy. The Preferred Strategy identified 5 new key housing-led sites, in addition to rolling forward several deliverable adopted LDP housing sites. The 5 new key sites were located to the North East of Barry, and in Dinas Powys, Rhoose and St Athan (2 sites).

- 1.8 The largest of the key sites, Land at North East Barry, was originally put forward through the candidate sites process by a national housebuilder and was identified in the Preferred Strategy as being able to deliver up to 900 units over the plan period up to 2036, with the potential for a further 600 units in subsequent plan periods.
- 1.9 Deliverability is an important factor in justifying the inclusion of a site for allocation and site ownership is an integral part of this. The site at North East Barry is under the control of several different landowners. Whilst statements of intent to release the site for development were received by the Council for a number of the development parcels, as the plan progressed there was a need for further certainty from all parties in the form of appropriate evidence, such as signed heads of terms, demonstrating commitment from the respective landowners that there is a common agreement on the delivery of the site. The Council actively engaged with the site promoters and landowner representatives throughout the process. However, insufficient evidence was received in respect of full landowner agreement to give sufficient confidence that a site of the scale originally envisaged can be brought forward within the plan period.
- 1.10 A report was considered by Cabinet in May 2025 on the implications of this for the RLDP and Cabinet approved a public consultation on three sites that could accommodate a large proportion of the units proposed on Land to the North East of Barry. This included one alternative key site at North West Barry for 376 units and two smaller sites at Neptune Road, Barry Waterfront, and Hayes Lane, The Bendricks, Barry. Collectively, these sites, together with existing permissions, completions since the start of the plan period, and known windfall sites, means that Barry continues to provide a level of growth that is commensurate with its status as a Key Settlement within the settlement hierarchy. This is discussed in more detail in Section 6 Spatial Distribution. Following the consultation, on 1<sup>st</sup> December 2025, Full Council approved the inclusion of the three sites in Barry within the Deposit Plan.

## **2      Housing Land Supply**

### **Land Bank Commitments**

2.1 Land Bank commitments within the Vale of Glamorgan which shall contribute towards meeting the authority's housing requirements come from the following sources:

- Dwellings completed since the start of the RLDP period (1<sup>st</sup> April 2021- 31<sup>st</sup> March 2025).
- Units currently under construction as of 1<sup>st</sup> April 2025.
- Sites with planning permission (outline, full or reserved matters)
- Sites where there has been a resolution to granted permission subject to a Section 106 agreement.

2.2 The Council's LDP Annual Monitoring Report (AMR) information provides the most recent evidence on housing completions and supply in this respect and the monitoring undertaken to inform this is therefore the starting point to identify these commitments.

### **Dwellings Completed between the 1<sup>st</sup> of April 2021 to March 31<sup>st</sup> 2025**

2.3 The RLDP Preferred Strategy requires 7,890 new dwellings to be accommodated in the Vale of Glamorgan during the 15-year LDP period from 2021 to 2036.

2.4 The plan period commenced on 1<sup>st</sup> April 2021. In the first four years of the plan period (1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2025), 1,747 units have been completed, as evidenced in Table 1 below. A total of 1,562 units were delivered on large sites (10 or more dwellings) and a further 185 units were delivered on small windfall sites (less than 10 dwellings). Table 1 also includes the source of each of the large sites.

**Table 1: Vale of Glamorgan Annual Dwelling Completions 1st April 2021 to 31st March 2025**

SETTLEMENT	SITE NAME	Source LDP Allocation/Windfall	Site Status 1 <sup>st</sup> April 2025	DWELLINGS COMPLETE 2021-22	DWELLINGS COMPLETE 2022-23	DWELLINGS COMPLETE 2023-24	DWELLINGS COMPLETE 2024-25
Barry	East Quay, (Land to West of Cory Way, South of the Graving Dock) Barry Waterfront (Persimmon)	LDP	Site Complete	0	0	62	0
Barry	Development land at East Quay, Barry Waterfront (to East of Cory Way) (United Welsh)	LDP	Site Complete	0	0	36	0
Barry	Land at Barry Waterfront, Cliffside Road, Barry (Taylor Wimpey)	LDP	Site Complete	20	0	0	0
Barry	South Quay (Waterside), Barry Waterfront (Barratt)	LDP	Site Complete	20	0	0	0
Barry	South Haven Phase 2, Barry Waterfront, Barry (Persimmon)	LDP	Site Complete	20	12	0	0
Barry	East Quay, Barry Waterfront, Barry (Taylor Wimpey)	LDP	Site Complete	0	28	30	0
Barry	Development land at East Quay, Barry Waterfront (Barratt)	LDP	Site Complete	0	43	13	0
Barry	Holm View (phase 1) (VOGC)	LDP	Phase 1 Complete	3	0	0	0
Barry	Holm View (phase 2) (VOGC)	LDP	Phase 2 Complete	0	0	0	31
Barry	Hayes Wood, The Bendricks (VOGC)	LDP	Site Complete	0	0	21	32
Cowbridge	Land to the north and west of Darren Close, Cowbridge (Taylor Wimpey)	LDP	Under construction	42	44	47	79
Llantwit Major	Land adjacent to Llantwit Major Bypass (Phase 1 and 2) (Barratt)	LDP	Site Complete	16	0	0	0
Llantwit Major	Land at the Former Eagleswell Primary School*	LDP	Site Complete	0	0	0	90

Penarth	Land at and adjoining St. Cyres School, Murch Road (Barratt)	LDP	Site Complete	5	0	0	0
Rhoose	Land north of the Railway Line, Rhoose (Taylor Wimpey)	LDP	Site Complete	33	0	0	0
Sully	Land West of Swanbridge Road, Sully (Taylor Wimpey)	LDP	Phase 1 Under construction	103	45	43	80
Bonvilston	Land to the east of Bonvilston (Acorn)	LDP	Under construction	5	6	1	0
Llandough	Land north of Leckwith Road	LDP	Site Complete	0	0	0	40
St Athan	Land to the east of Eglwys Brewis (Barratt/David Wilson)	LDP	Under construction	20	80	75	62
Barry	Castle Hotel, Jewel Street, Barry (Newydd)	Windfall	Site Complete	0	0	14	0
Barry	Sea View Labour Club, Dock View Road, Barry (Newydd)	Windfall	Site Complete	0	0	28	0
Barry	Former Windsor Hotel, Holton Road, Barry (Newydd)	Windfall	Site Complete	0	0	18	0
Barry	Haydock House, 1, Holton Road, Barry (Hafod)	Windfall	Site Complete	0	0	16	0
Barry	Land at Hayes Road, Barry (VOGC)	Windfall	Site Complete	0	23	0	0
Barry	St. Pauls Church and Hall, St. Pauls Avenue, Barry (Hafod)	Windfall	Site Complete	0	27	0	0
Barry	Colcot Health Clinic, Winston Road (VOGC)	Windfall	Site Complete	0	0	0	12
Barry	Land at Subway Road, Barry (Wales & West)	Windfall	Site Complete	72	0	0	0
Penarth	Northcliffe Lodge, Northcliffe Drive, Penarth (Celtic Developments)	Windfall	Site Complete	4	13	0	0
Penarth	Land to the rear of Nos. 2 to 4, St. Cyres Road, Penarth (VOGC)	Windfall	Site Complete	0	0	14	0
Wenvoe	The Old Rectory, 10-12, Old Port Road, Wenvoe (Local developer)	Windfall	Site Complete	0	10	0	0
St Athan	Land off Gileston Road (Wales and West)	Windfall	Site Complete	0	0	0	18

Ffwrn Goch	Cwrt Canna, land adjacent to Llangan Primary School, Llangan (Newydd)	Windfall	Site Complete	6	0	0	0
	<b>LARGE SITES TOTAL</b>			<b>369</b>	<b>331</b>	<b>418</b>	<b>444</b>
	<b>SMALL SITES (LESS THAN 10 UNITS)</b>			<b>62</b>	<b>23</b>	<b>56</b>	<b>44</b>
	<b>TOTAL DWELLINGS FOR YEAR</b>			<b>431</b>	<b>354</b>	<b>474</b>	<b>488</b>
	<b>TOTAL COMPLETIONS 1<sup>st</sup> April 2021 - March 31<sup>st</sup> 2025</b>				<b>1747</b>		

\* Land at the Former Eagleswell School has been redeveloped as 90 units of temporary accommodation for those in need. The planning permission is for a period of 5 years, after which time the modular units will be relocated to other locations in the Vale. As these units are providing accommodation for 90 households and the intention is for the units to be re-utilised on other sites in the longer term, the units have been counted as completions.

## Sites with Planning Permission

- 2.5 Sites that already have planning permission form another significant component of supply, including developments that are already under construction. Sites that have been resolved to be approved subject to the signing of a Section 106 agreement have also been included within the supply where it is realistically likely that the agreement will be signed.
- 2.6 Table 2 below details the sites which are also considered deliverable during the Plan Period; thereby justifying their inclusion within the 'Land Bank Commitments'. This indicates that the total number of dwellings remaining on would contribute **1,860** dwellings to the housing land supply, with a further **313** units under construction. Table 2 also identifies the developer where known. It will be noted that most sites within the table are either being brought forward by major or local housing developers, including Registered Social Landlords and the Council itself as part of its own house building programme.
- 2.7 The sites with planning permission have been discussed with the developers as part of the preparation of the housing trajectory for the AMR and those sites included on the list below are realistically likely to be delivered during the RLDP plan period.

**Table 2: Sites with Planning Permission**

Site name	Settlement	Source	Status	Application Reference	Total number of units	Units complete by 1st April 2025	Units U/C 2025	Units Not Started April 2025	Affordable units not started or U/C April 25
81-85, Holton Road (Former Dan Evans) (Hafod)	Barry	Windfall	U/C	2021/00622/FUL	25	0	25	0	25
Land at Coldbrook Road East, Cadoxton (VOGC)	Barry	Windfall	U/C	2021/01743/FUL	20	0	20	0	20
Former Railway Sidings, Ffordd y Mileniwm (Hafod)	Barry	Windfall	Planning permission granted	2023/01140/RES	56	0	0	56	56
Crossways Methodist Church (Newydd)	Barry	Windfall	U/C	2023/00087/FUL	15	0	15	0	15
Olive Tree Lodge, Port Road East (VOGC)	Barry	Windfall	U/C	2022/00689/RG3	10	0	10	0	10
Cadoxton House (VOGC)	Barry	Windfall	Planning permission granted	2024/00230/RG3	13	0	0	13	13
56a, Windsor Road( Former Monty Smith Ltd) (Local Developer)	Penarth	Windfall	U/C	2018/01420/FUL	21	0	21	0	9
Land adjacent to Oak Court (Phase 1) (Wales and West)	Penarth	LDP Allocation	U/C	2022/00294/HYB	70	0	70	0	70
Land adjacent to Oak Court (Phase 2) (VOGC)	Penarth	LDP Allocation	Planning permission granted	2022/00294/HYB	32	0	0	32	32

Site name	Settlement	Source	Status	Application Reference	Total number of units	Units complete by 1st April 2025	Units U/C 2025	Units Not Started April 2025	Affordable units not started or U/C April 25
Cowbridge Comprehensive 6th Form Block, Aberthin Road (Hafod)	Cowbridge	LDP Allocation	U/C	2018/01408/FUL	34	0	34	0	34
Darren Farm, Westgate (McCarthy and Stone)	Cowbridge	Windfall	Planning permission granted	2023/00826/FUL	50	0	0	50	0 (commuted sum)
Land to the north and west of Darren Close (Taylor Wimpey)	Cowbridge	LDP Allocation	U/C	2017/00841/RES – Phase 1 – 169 Units Phase 2 : 2018/0240/RES – 306 Units	475	298	38	139	65
Cowbridge Police Station (VOGC)	Cowbridge	Windfall	Planning permission granted	2024/00565/FUL	14	0	0	14	14
Land to the east of Eglwys Brewis (Barratts David Wilson)	St Athan	LDP Allocation	U/C	2019/01408/RES	253	243	10	0	3
Land at Higher End (Phase 2) (Newydd)	St Athan	LDP Allocation	Planning permission granted	2022/00266/RES	25	0	0	25	25
St. Athan Boys Village (Local Developer)	St Athan	Windfall	Planning permission granted	2022/00452/RES	15	0	0	15	6

Site name	Settlement	Source	Status	Application Reference	Total number of units	Units complete by 1st April 2025	Units U/C 2025	Units Not Started April 2025	Affordable units not started or U/C April 25
Land to the North of Heol Y Pentir (Wales and West)	Rhoose	Windfall	U/C	2022/00602/RES	15	0	15	0	15
Land West of Swanbridge Road (Phase 1) (Taylor Wimpey)	Sully	LDP Allocation	U/C	2019/00111/RES	325	287	38	0	4
Land West of Swanbridge Road (Phase 2) (Taylor Wimpey)*	Sully	LDP Allocation	Planning permission granted	2016/01520/OUT 190 Dwellings. RSM expected for 175	175	0	0	175	75
Land to the east of Bonvilston	Bonvilston	LDP Allocation	U/C	2015/00960/FUL	120	40	0	80	25
Land at St. Brides Road (Wales and West)	Wick	Windfall	U/C	2021/01081/FUL	17	0	17	0	17
Land off Sandy Lane (Phase 2) (Lewis Homes)	Ystradownen	LDP Allocation	Planning permission granted	2023/00948/FUL	46	0	0	46	18
Dunraven Court, Beach Road (Local Developer)	Southerndown	Windfall	Planning permission granted	2019/00503/FUL	22	0	0	22	0 (commuted sum)
Hensol Castle, Hensol Castle Park (Local Developer)	Hensol	Windfall	Planning permission granted	2018/00482/HYB	16	0	0	16	0

Site name	Settlement	Source	Status	Application Reference	Total number of units	Units complete by 1st April 2025	Units U/C 2025	Units Not Started April 2025	Affordable units not started or U/C April 25
Land between the Northern Access Road and Eglwys Brewis Road (Site B - Eastern Parcel) (WG Land)*	Llantwit Major	LDP Allocation	Planning application deferred for completion of legal agreement	2020/00352/OUT	100	0	0	100	35
Land between the Northern Access Road and Eglwys Brewis Road (Site A - Western Parcel) (WG Land)*	Llantwit Major	LDP Allocation	Planning application deferred for completion of legal agreement	2020/00351/OUT	140	0	0	140	49
Land south of Llandough Hill / Penarth Road*	Llandough	LDP Allocation	Planning permission granted	2020/01590/HYB	133	0	0	133	20
Leckwith Quay, Leckwith Road, Leckwith	Leckwith	Windfall	Planning permission granted	2020/01218/HYB	228	0	0	228	23
Land at Upper Cosmeston Farm, Lavernock Road*	Penarth	LDP Allocation	Planning application deferred for completion of legal agreement	2020/01170/OUT	576	0	0	576	230

Site name	Settlement	Source	Status	Application Reference	Total number of units	Units complete by 1st April 2025	Units U/C 2025	Units Not Started April 2025	Affordable units not started or U/C April 25
							313	1,860	908

\*Site forms part of the Major Land Bank, defined as sites with 100 or more dwellings that have planning permission, including where there is a resolution to grant planning permission subject to s106, the site is located within the strategic growth area and construction on the site has not commenced.

## **Non-Delivery Allowance**

- 2.8 The DPM advises that a 'non-delivery allowance' could be factored in to the land supply calculations, discounting a proportion of the land bank to accommodate sites with planning permission that do not come forward as anticipated. The DPM states that this may be relevant for those LPAs with a large number of land bank sites, rather than those with just a few. This 'non delivery allowance' is separate to the flexibility allowance that is applied to the plan as a whole.
- 2.9 The land bank as set out in Table 2 comprises 29 sites. Of these, 13 of these are currently under construction, and a further 6 sites are going through the process of discharging conditions, which is an indication that there is an intention for construction to commence in the near future. All sites included within the land bank are actively being progressed by the developers or sites promoters. A total of 13 of the sites are actively being brought forward by the Council or its RSL partners.
- 2.10 The DPM states that the non-delivery allowance should be based on local circumstances. Sites could either be discounted individually, or a percentage can be applied across the whole land bank. In understanding what this percentage should be, consideration should be given to the proportion of sites that did not come forward in the past.
- 2.11 As one of the more viable locations for development in Wales, the Vale of Glamorgan has a strong record for the implementation of sites that have received planning permission. An analysis of large windfall sites that have been granted permission since 2011 has been undertaken. This identified that 57 large windfall sites (10 or more dwellings) have been granted planning permission since 2011. This equates to 1,436 units. Planning permission has only lapsed on 3 of these sites, which equates to 5% of the total number of sites with permission. In terms of units, the lapsed permissions equated to 88 units, which represents 6% of the overall number with units with permission. Appendix 1 provides a list of all sites.
- 2.12 The adopted LDP allocates 48 sites for housing. As of the 2024 AMR, 39 of these sites had planning permission for at least part of the allocated site, with 6,648 units with a valid permission or deferred for the completion of a Section 106 agreement. Planning permission has only lapsed on part of one site (350 units). If this is added to the total for allocated sites that have ever had a permission, lapsed permissions equate to 5% of the total units approved on allocated sites. As a proportion of sites, this equates to 0.5 of the 39 sites that had permission, or 1.3% of all sites.
- 2.13 Collectively, these two sources of evidence on past non-delivery demonstrate that a low non-delivery allowance of 5% would be appropriate. This would be taken as a percentage of the overall units with permission where construction

has yet to commence, as it is realistic to assume that those sites where development has commenced will be built out within the plan period. There are 1,663 units on sites where construction has not commenced. A 5% non-delivered allowance equates to 83 units.

2.14 As it is not known which, if any, of the sites with permission would not be delivered, for the purposes of any analysis of the spatial distribution, it has been assumed that the 5% non-delivery allowance would be applied proportionately across all tiers of the hierarchy where there are sites with planning permission. This has been factored in within Table 8.

### **Allowance for Large Windfall Sites**

2.15 Windfall sites are sites with a capacity of 10 or more residential units that are not specifically allocated for housing yet come forward in accordance with the development plan and other material planning considerations. Assessing the likely contribution that such sites can make to the housing land supply requires consideration of the sites that have come forward under the respective LDP policies in recent years.

2.16 Given the very nature of windfall sites, it is considered most realistic to monitor the total number of units completed annually as opposed to the number of units with planning consent, although these permitted sites can give a useful 'sense check' of the accuracy of the future RLDP large site windfall allowance. This method helps to provide a realistic estimate of the likely contribution such sites may make to the land supply. A list of sites approved since 2021 is included in Appendix 1. This identifies that, on average, planning permission has been granted for 103 windfall units per annum. As explained in the previous section on the non-delivery allowance, only 6% of these windfall permissions have lapsed.

2.17 Further evidence on the likely completions on windfall sites is contained within the Urban Capacity Study (UCS), which considers potential development and redevelopment opportunities in the two largest settlements in the Vale of Glamorgan – Barry and Penarth. The UCS identifies that there remains a large number of potential sites available in Barry in particular, which will help support the windfall assumptions.

2.18 The DPM states that past delivery rates should be reviewed for large and small sites across different time periods and the reason for choosing these time periods should be explained.

**Table 3: Annual Large Windfall Completions 2001-2025**

Year	Number of windfall units completed	Windfall as a % of large site completions
2001-2	54	9
2002-3	118	21
2003-4	66	15
2004-5	71	19
2005-6	95	27
2006-7	1	1
2007-8	173	53
2008-9	35	100
2009-10	71	100
2010-11	32	31
2011-12	107	100
2012-13	56	52
2013-14	12	20
2014-15	42	18
2015-16	87	15
2016-17	55	7
2017-18	71	9
2018-19	11	2
2019-20	186	21
2020-21	111	15
2021-22	82	22
2022-23	73	22
2023-24	90	22
2024-25	30	7
<b>24 Year Total</b>	<b>1729</b>	
<b>24 Year Average</b>	<b>72</b>	<b>29</b>
<b>14 Year Total (LDP Plan Period)</b>	<b>1013</b>	
<b>14 Year Average</b>	<b>72</b>	<b>24</b>
<b>10 Year Total</b>	<b>796</b>	
<b>10 Year Average</b>	<b>80</b>	<b>14</b>

**2.19** Table 3 provides a summary of annual large windfall completions over the 24-year period 2001-2025, over the 14 years of the LDP plan period (2011-2025) and also the last 10 years (2015-2025). It will be noted that windfall completions are varied. It would normally be expected that over the course of a plan period, the number of windfall completions would increase as opportunities that may not have been known about at the time of plan preparation become available. This has not been the case in the Vale as windfall completions have not followed a specific pattern. The majority of the windfall sites have been brownfield redevelopment opportunities in the main urban areas, brought forward by RSLs to deliver affordable housing. Due to the significant need for 1-bedroom properties, many of these schemes have been apartments, which are normally completed and handed over in a single year,

which differs from market schemes, which may be spread across several years as units are sold. This has led to peak years where several schemes are handed over, followed by years with less units.

2.20 Table 3 also considers the percentage contribution that the windfall completions made to the large site completion totals. It will be noted that there is more variation in the figures in the first 15 years of the monitoring, with the proportion of windfalls being as high as 100% in some years. Over the LDP plan period, windfalls equate to an average of 24% of all completions and in the last 10 years the data has been more stable with windfalls accounting for an average 14% of all large completions.

2.21 Whilst there has been variation between the years, an assessment of windfall completions against different timescales shows that the average for the last 10 years period (2015/16-2024/25) is 80 units per annum, and over longer-term trends for both the last 14 years and the last 24 years the average is 72 units per annum. These figures are broadly similar to the assumption of 74 units per annum included in the Housing Land Supply Paper prepared to support the Preferred Strategy, which was based on the 10 years 2011 to 2021.

2.22 For the purposes of the windfall calculation, it is considered that the last 10 years is an appropriate timeframe for consideration as it would exclude any skewed data where windfall units were 100% of all completions and would reflect a period that is more likely to reflect the RLDP plan period – windfalls equating to a smaller proportion of the overall housing delivery. The assumption of **80 units per annum** for large windfall sites will be applied. This equates to 15% of the average annual requirement of 526 units per annum, or 17% of the average annual requirement to be delivered on large sites (526 minus a small site assumption of 53 per annum). This is comparable to the 10-year average of 14% but lower than the long-term average of 29%.

2.23 The DPM states at paragraph 5.73: “LPAs should ensure there is no double counting in the early years of the plan between large windfall sites and those with planning permission. **In practice, it is not recommended to include a large windfall allowance rate within the first 2 years of projected supply to avoid issues of double counting.**”

2.24 To avoid potential double counting between the windfall sites that are also in the supply and the windfall allowance, the large windfall assumption has not been applied for the next 2 years and has only been applied to the final 9 years of the plan period. At 80 units per annum, this equates to 720 dwellings.

### **Allowance for Small Windfall Sites**

2.25 Small windfall sites are sites that accommodate 9 or less dwellings. These were specifically recorded as part of the annual Joint Housing Land Availability Studies up until 2019 and in the reporting of housing delivery within the Council’s LDP AMRs. Such sites also make an important contribution to the

overall housing land supply, introducing an element of choice and flexibility into the housing market as they are generally delivered by self-builders and SME developers. Small sites can include infill plots, the subdivision of buildings, changes of use from non-residential to residential and redevelopment of smaller areas of land.

2.26 An allowance needs to be made for small sites that are likely to be delivered over the RLDP plan period based on an assessment of past trends. Table 4 below illustrates the number of annual small site completions over the 24-year period (2001-2025) as well as the last 10 years 2015/16-2024/25.

**Table 4: Annual Small Windfall Completions 2001-2025**

Year	Number of windfall units completed	Small site completions as a % of total completions
2001-2	70	10
2002-3	144	20
2003-4	78	15
2004-5	40	10
2005-6	153	30
2006-7	110	36
2007-8	77	19
2008-9	30	46
2009-10	47	40
2010-11	23	18
2011-12	55	34
2012-13	80	43
2013-14	54	47
2014-15	44	16
2015-16	44	7
2016-17	85	10
2017-18	46	6
2018-19	78	13
2019-20	33	4
2020-21	32	4
2021-22	62	15
2022-23	23	6
2023-24	56	12
2024-25	44	9
<b>24 Year Total</b>	<b>1508</b>	
<b>24 Year Average</b>	<b>63</b>	<b>20</b>
<b>14 Year Total</b>	<b>736</b>	
<b>14 Year Average</b>	<b>53</b>	<b>16</b>
<b>10 Year Total</b>	<b>503</b>	
<b>10 Year Average</b>	<b>50</b>	<b>9</b>

2.27 Table 4 indicates that small windfall sites provide a relatively consistent supply of housing within the authority, and whilst it is noted that there have been several years where a spike in completions have occurred, average small site completions have remained relatively stable averaging some 63 dwellings annually over the long term, 53 dwellings over the LDP plan period and 50 dwellings annually over the last 10 years.

2.28 The annual delivery of small windfall sites over these two timeframes is on par with the small windfall allowance of 58 dwellings per annum agreed as part of the overall housing land supply for the adopted plan. As a percentage of overall units completed, the figures have been relatively stable since the start of the LDP plan period in 2011, although there was significantly more variation in the first 10 years of the monitoring (2001-2011). As the data from the last 14 years reflects the LDP plan period and there has been stability in the figures, it is considered that the 14-year average small site figure of 53 units per annum should be used. This would deliver **583** additional dwellings (11 years x 53 dwellings per annum) to the overall housing target over the plan period. A 11-year allowance is identified to ensure no double counting of small windfalls that were built in the years 2021-25. A small site assumption of 53 units a year would equate to 10% of all completions at an average annual requirement of 526 units per annum. This broadly equates to the trends over the last 10 years but is conservative when compared to longer term trends.

### 3 Housing Allocations

#### LDP Allocations to be Carried Forward

3.1 The DPM indicates that sites can be ‘rolled forward’ from the adopted LDP into the RLDP. Such sites will need to be carefully justified, and it will need to be demonstrated that they are both sustainable and deliverable. It is proposed that 7 sites, totalling 959 units, should be rolled forward into the RLDP. Four of the sites have been subject to planning applications, and two of the others are in the ownership of public bodies and work is actively progressing in bringing the sites forward for development.

**Table 5: 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 as part of the
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>	

3.2 The DPM states that “if an LPA wishes to retain such sites but cannot evidence they will be delivered, i.e. for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as ‘bonus sites’.” It is proposed to identify the following site within this category:

**Table 6: Redevelopment opportunity**

Site Name	Status	Comment
Former Eagleswell Primary School, Llantwit Major	LDP Allocation	Not to be included in the land supply.

3.3 The site at Eagleswell is in Council ownership and has been developed as temporary accommodation using modular units, providing accommodation for 90 households. The planning permission for the site is for a period of up to 5 years and as a result of it being part of the housing stock to provide homes to people in need, the 90 units have been counted in the completed units for 2024. Prior to the expiration of the planning consent, it is intended that the modular units will be relocated elsewhere in the Vale to continue to provide housing for those in need.

3.4 It is intended that the site be redeveloped for housing or potentially a mix of uses including housing following the relocation of the modular homes. It would not be appropriate to count any future completions generated from this site as this would essentially be double counting the contributions from the site. As such, it is proposed to identify the site as an aspirational site, which would not form part of the housing supply, but would reconfirm the commitment to bringing new housing forward on the site in the long term.

3.5 There are several allocations or parts of allocations within the adopted LDP which the Council consider will not come forward during the RLDP and shall be excluded from the supply for the RLDP. Table 7 sets out the justification for excluding each site.

**Table 7: Adopted LDP Allocations to be excluded from housing land supply**

Reference	Site Name	Number of units	Reason for Removing from supply
MG2 (2) Part	Remainder of land at Higher End, St Athan	95	Part of the site now has planning permission (2022/00266/RES) for 25 dwellings. The remaining land was not submitted as a candidate site through the two calls for sites and it has not been demonstrated that it is a deliverable site.
MG2 (8)	Barry Island Pleasure Park, Barry	25	Site has not been submitted as a candidate site and is site operating as a pleasure park.
MG2 (14)	Court Road Depot, Barry	50	Site has been redeveloped as an educational facility.
MG2 (19) Part	Remainder of land at St Athan Road, Cowbridge (Beggars Bush)	1.9 Ha (units unknown)	Site submitted as a candidate site separately from the adjoining allocated land but not supported by evidence of

			viability and deliverability.
MG2 (26)	Headlands School, St. Augustine's Road, Penarth	65	Main part of the site retained for educational purposes.
MG2 (32) Part	Remainder of land south of Llandough Hill, Llandough (Penarth)	0.7 Ha (units unknown)	Adjoining land has planning permission, but the remaining parcel is a former reservoir. It was submitted as a candidate site but, on its own, has significant access and ecological constraints
MG2 (34)	Llandough Landings	120	Site has not been submitted as a candidate site. Landowners have indicated that the site is unviable. The site is affected by flooding.

3.6 As only those sites that are deemed suitable to be rolled forward have been included in the figures, it is not considered necessary to apply any further discounting to the rolled forward figure. This accords with the DPM which states that sites can be discounted individually, or a non-delivery allowance can be applied as a percentage.

### New Housing Allocations

3.7 The final part of the housing land supply are new allocations. These have been categorised into three types of sites. Table 8 sets out the key sites that are of a significant scale and will have an important role in delivering the RLDP Strategy of Sustainable Growth within the strategic growth area. Table 9 sets out those housing allocations that are smaller in scale but will also support the delivery of new housing in the strategic growth area. Finally, Table 10 allocates several affordable housing led sites. These are sites located outside the strategic growth area but where 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.

**Table 8: Key Sites**

Site Name	Settlement	Number of units
Land at North West Barry	Barry	376
Land north of Dinas Powys	Dinas Powys	250
Land at Readers Way	Rhose	520
Land at Church Farm	St Athan	532
Land west of St Athan	St Athan	600
	<b>Total</b>	<b>2,278</b>

**Table 9: Other Housing allocations**

<b>Site Name</b>	<b>Settlement</b>	<b>Number of units</b>
Land at Neptune Road, Barry Waterfront	Barry	40
Land at Hayes Lane, The Bendricks	Barry	70
Land south of Clive Road	St Athan	51
	<b>Total</b>	<b>161</b>

**Table 10: Affordable Housing Led Sites**

<b>Site Name</b>	<b>Settlement</b>	<b>Number of units</b>
Land to the East of Colwinston,	Colwinston	25
Land west of Maendy Road	Aberthin	25
Land at Heol Fain,	Wick	50
Land north of West Winds Business Park	Fferr Goch	22
	<b>Total</b>	<b>122</b>

## 4 Housing Land Supply

4.1 The Table below draws the above elements together to summarise the existing components of the land supply.

**Table 11: Components of Supply**

	Component of Supply	Number of Dwellings	Notes
<b>A</b>	Completions 21/22 - 24/25	1,747	Comprising 1,562 dwellings on large sites and 185 dwellings on small sites
<b>B</b>	Units under construction 1 <sup>st</sup> April 2025	313	
<b>C</b>	Units within planning permission	1,860	Includes sites that have S106 agreements pending where it is realistic that the agreement will be signed.
<b>D</b>	Non-delivery allowance for land bank	-83	Assumed 5% of units with planning permission where construction has not already commenced (1,663 units) will not be delivered based on past delivery rates
	<b>Total Existing Supply (A+B+C-D)</b>	<b>3,838</b>	
<b>E</b>	Large Sites Windfall Allowance (10 or more dwellings)	720	Based on past delivery rates. To avoid double counting of large windfall sites already within the land supply, this allowance has been discounted from the first 2 years of the land supply and applied to the subsequent 9 remaining years of the plan (80 dwellings x 9 years)
<b>F</b>	Small Sites Windfall Allowance	583	Based on past delivery rates. This allowance has been applied to the remaining 11 years of the plan period (53 dwellings x 11 years)
	<b>Total Windfall allowance (E+F)</b>	<b>1,303</b>	
	RLDP allocations	3,521	Key sites – 2,278 units New housing allocations – 161 units Rolled forward sites – 959 units Affordable housing led sites – 122 units
	<b>Housing Provision</b>	<b>8,660</b>	

4.2 The housing requirement for the plan is 7,890 dwellings, based on the agreed dwelling led scenario of 526 dwellings per annum. The housing provision of **8,660** dwellings rounds to a 10% flexibility allowance, which is considered reasonable. This level of flexibility would accord with the DPM, which states that the starting point for the consideration of a flexibility allowance is 10% and any variation from this would need to be robustly evidenced. Given the evidence presented above on the good record of delivery on both allocated and windfall sites, and the significant focus placed on deliverability in the RLDP plan preparation process, it is considered that a 10% flexibility should be considered a maximum as there is no local justification to exceed this.

### **Housing Allocations in the Deposit RLDP**

4.3 The table below provide sets out the list of housing sites proposed for allocation in the Deposit RLDP. This housing allocations are split across 4 policies. Policy HG1 allocates the five key sites, alongside other housing allocations including new smaller allocations and those sites rolled forward from the RLDP that do not have planning permission. The policy also identifies the major land bank sites of 100 or more dwellings that have planning permission, including where there is a resolution to grant subject to Section 106, and where construction has not commenced.

4.4 Sites of less than 100 dwellings, sites where construction has commenced and sites with permission located outside of the strategic growth area are not included within the strategic land bank but do form part of the overall housing supply.

4.5 An additional Policy identifies the small-scale affordable housing led allocations in sustainable minor rural settlements and primary settlements outside of the strategic growth area. The justification for these allocations is set out in the Candidate Site Assessment evidence.

### KEY SITES (POLICY HG1)

Site Reference	Settlement	Site Name	Number of units
HG1 KS1	Barry	Land at North West Barry	376
HG1 KS2	Dinas Powys	North of Dinas Powys, off Cardiff Road	250
HG1 KS3	Rhoose	Land at Readers Way	520
HG1 KS4	St Athan	Land at Church Farm	532
HG1 KS5	St Athan	Land to the West of St Athan	600
<b>Dwelling Contribution</b>			<b>2,278</b>

### HOUSING ALLOCATIONS

Site Reference	Settlement	Site Name	Number of units
HG1 (1)	Barry	Land to the west of Pencoedtre Lane	135
HG1 (2)	Barry	Land at the Mole	65
HG1 (3)	Barry	Land at Hayes Lane	70
HG1 (4)	Barry	Land at Neptune Road	40
HG1 (5)	Llantwit Major	Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)	235
HG1 (6)	Cowbridge	Land adjoining St Athan Road	105
HG1 (7)	St Athan	Former Stadium Site, adjacent to Burley Place	80
HG1 (8)	St Athan	Land south of Clive Road, St Athan	51
HG1 (9)	Rhoose	Land north of the Railway Line (East)	339
<b>Dwelling Contribution</b>			<b>1,120</b>

### MAJOR LAND BANK SITES

Site Reference	Settlement	Site Name	Number of units
HG2 (1)	Penarth	Land at Upper Cosmeston Farm*	576
HG2 (2)	Llantwit Major	Land between the Northern Access Road and Eglwys Brewis Road (Site A - Western Parcel)	140
HG2 (3)	Llantwit Major	Land between the Northern Access Road and Eglwys Brewis Road (Site B - Eastern Parcel)	100
HG2 (4)	Llandough	Land south of Llandough Hill / Penarth Road	133
HG2 (5)	Sully	Land West of Swanbridge Road (Phase 2)	175
<b>Dwelling Contribution</b>			<b>1,124</b>

### AFFORDABLE HOUSING LED SITES OUTSIDE THE STRATEGIC GROWTH AREA (POLICY HG4)

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

## 5 Affordable Housing

5.1 The Replacement LDP has a key role in ensuring new housing development incorporates a mix of market and affordable housing, thereby contributing to the development of sustainable, cohesive communities. This includes incorporating a range of tenures and property sizes, to cater for the plethora of housing needs identified across the Vale. Planning Policy Wales Edition 11 (PPW), states that:

*“Planning authorities must understand all aspects of the housing market in their areas, which will include the requirement, supply, and delivery of housing. This will allow planning authorities to develop evidence-based market and affordable housing policies in their development plans and make informed development management decisions that focus on the creation and enhancement of Sustainable Places (WG, 2021, para 4.2)”*

5.2 Key to the understanding of the level of affordable housing is the Local Housing Market Assessment (LHMA), which identifies the level and type of housing need per annum, both numerically and spatially.

5.3 The Development Plans Manual (Edition 3) requires LHMA to “identify the total affordable housing need extrapolated over the plan period, spatial implications and the predominant tenure mix required” (para 5.32).

5.4 The Council’s latest Local Housing Market Assessment (LHMA, 2023) illustrates the pressing need for affordable housing within the authority, identifying a net annual need for 1,075 affordable units per annum in the Vale of Glamorgan for the period 2023-28, and a further 154 units per annum over the following 10 years.

5.5 Over the 15-year period of the RLDP, the LHMA identifies an annual need for 461 affordable units per annum (6918 in total), comprising 306 social rented units and 156 units of intermediate housing. The greatest need for affordable housing annually is within Barry, Penarth/Llantough, Llantwit Major, Dinas Powys and Rhoose, however the LHMA identifies a need of affordable housing across the authority. The greatest need is for one- and two-bedroom properties, across all areas of the Vale of Glamorgan, although in some areas the LHMA identifies a requirement for 3- and 4-bedroom properties.

### Addressing the Affordable Housing Need through the RLDP

5.6 PPW states that “*development plans must include a target for affordable housing (expressed as numbers of homes)*” (WG, 2021, para. 4.2.28). This should be based on the LHMA and identified through the expected contributions that the LDP, and its policies, will make to meet this target, whilst taking account of both deliverability and viability considerations. These latter points are pertinent as the level of affordable housing contributions that can be secured through the planning system is integrally dependent on how

viable it is for different areas and sites to provide affordable housing, along with all other necessary planning contributions. Edition 3 of the Development Plans Manual confirms, “*LPAs should maximise the delivery of affordable housing in their LDP, based on the viability evidence of allocations/sites in their plan*” (WG, 2020, para 5.105).

5.7 In terms of development viability and affordable housing provision, the Council is currently reviewing viability evidence that will inform a review of the Council’s current affordable housing requirements as set out in the adopted LDP. This review shall inform the affordable housing target of the RLDP, which it anticipates the LDP can achieve through the various components of the housing land supply set out in the RLDP.

5.8 Notwithstanding this, the Council has undertaken an assessment of the current housing land bank as detailed in section 2 of this paper to identify the affordable housing contributions that these sources are expected to achieve.

### **Contribution from sites with planning permission and or under construction**

5.9 Since the commencement of the RLDP, annual affordable housing monitoring indicates that for the period 2021-2025 a total of 702 additional affordable houses have been provided, as detailed in Table 12. This also includes small affordable housing developments (sites of less than 10 dwellings).

**Table 12: Additional Affordable Housing Provision 2021-2025**

Settlement	Site Name	Additional Affordable Housing
		2021-2025
Barry	Barry Waterfront	87
Barry	Holm View (phases 1 and 2)	34
Barry	Hayes Wood, The Bendricks	53
Cowbridge	Land to the north and west of Darren Close	82
Sully	Land West of Swanbridge Road, Sully (Phase 1)	92
Llandough	Land north of Leckwith Road	40
St Athan	Land to the east of Eglwys Brewis	51
Barry	Castle Hotel, Jewel Street, Barry	14
Barry	Sea View Labour Club, Dock View Road	28
Barry	Former Windsor Hotel, Holton Road,	18
Barry	Haydock House, 1, Holton Road	16
Barry	Land at Hayes Wood,	23
Barry	St. Pauls Church and Hall	27
Barry	Colcot Health Clinic, Winston Road	12
Barry	Land at Subway Road	72
Barry	21, Porthkerry Road	8
Barry	Former Fire Station Court Rd,	7
Penarth	Land to the rear of Nos. 2 to 4, St. Cyres Road	14

St Athan	Land off Gileston Road	18
Fferr Goch	Land adjacent to Llangan Primary School, Llangan	6
	<b>Total</b>	<b>702</b>

5.10 In terms of sites with planning permission and/or currently under construction, analysis of planning reports and section 106 agreements indicates that these sites will provide an additional 908 affordable dwellings during the plan period, as shown in Table 2.

### **Contribution from existing LDP allocations to be carried forward into the RLDP**

5.11 A further source of affordable housing will be through the contribution made from existing LDP allocations which the Council consider are deliverable and align with the spatial strategy of the emerging RLDP. Together the Council anticipate that these sites have the potential to provide a further 222 affordable dwellings (Table 13). This is based on the assumption that the sites come forward for policy compliant levels of affordable housing. It may be the case that the sites are delivered for up to 100% affordable housing if brought forward by the Council or the Council's RSL development partners and therefore this figure should be seen as a minimum. A total of 222 affordable units are anticipated to be delivered on rolled forward sites.

**Table 13: Affordable Housing arising from rolled forward LDP sites**

LDP Site Name	Site Capacity	Affordable Housing Policy Requirement	Total Affordable
Land to the west of Pencoedtre Lane, Barry	135	30%	41
Land adjoining St. Athan Road, Cowbridge	105	40%	42
Land north of the Railway Line, Rhoose (East).	339	35%	119
The Mole, Barry	65	30%	20
<b>Total</b>			<b>222</b>

### **Contribution from RLDP Key, Additional and Affordable Housing Led Sites**

5.12 Table 14 provides a summary of the affordable housing provision that will be provided on the key housing and additional housing sites, based on the RLDP policy requirements. This is based on the assumption that the sites come forward for policy compliant levels of affordable housing. It may be the case that the sites are delivered for up to 100% affordable housing if brought forward by the Council or the Council's RSL development partners and therefore this figure should be seen as a minimum. A total of 952 affordable units are anticipated to be delivered on the key site and additional site allocations.

**Table 14: Key and Additional Housing allocations Affordable Housing Contribution**

Site Name	Policy Requirement	Total dwellings	Total Units Affordable
North West Barry	30%	376	113
Land North of Cardiff Road, Dinas Powys	40%	250	100
Readers Way, Rhoose	35%	520	182
Land at Church Farm, St Athan	35%	533	186
Land to the West of St Athan	35%	600	210
Land at Hayes Lane, Barry	30%	70	21
Land at Neptune Way, Barry	30%	40	12
Land between new Northern Access Road and Eglwys Brewis Road, Llantwit Major	35%	235	82
Land adjacent to Burley Place, St. Athan	35%	80	28
Land South of Clive Road, St Athan	35%	52	18
		<b>Total</b>	<b>952</b>

5.13 In addition, another 62 units to be delivered on affordable housing led sites, where a minimum of 50% affordable housing will be required. These are anticipated to be delivered through Section 106 agreements.

**Table 15: Affordable Housing Led Sites**

Site Name	Policy Requirement	Total dwellings proposed	Total Units Affordable
Land to the East of Colwinston,	50%	25	13
Land west of Maendy Road	50%	25	13
Land at Heol Fain,	50%	50	25
Land north of West Winds Business Park	50%	22	11
		<b>Total</b>	<b>62</b>

#### **Contribution from Large Windfall sites of 10 or more units**

5.14 Table 16 above provides an indication of the likely spatial distribution of large and small windfall sites over the RLDP plan period. To calculate the potential affordable housing contribution arising from 720 large windfall dwellings projected to come forward, the Council has applied the current LDP affordable housing policy requirements to the spatial distributions of large windfalls.

5.15 For Barry a 30% provision had been applied to the 506 anticipated windfall dwelling figure, which could provide 91 affordable dwellings. Outside of Barry, across the remaining settlement categories a further 417 dwellings are projected, where current policy requires either 35% or 40% affordable housing requirement depending. For these windfalls a 37.5% affordable contribution has been applied (this being the medium point of the 35% and

40% requirement). This equates to some 113 affordable dwellings, and a combined affordable contribution of 224 dwellings.

**Table 15: Contribution from windfall sites**

Area and Affordable Housing %	Large Windfall figure	Potential affordable housing contribution
Barry: 30%	303	91
All other areas: 37.5% average	417	113
	Total	224

### **Contribution from Small Windfall (sites between 1 and 9 dwellings)**

5.16 Current LDP policy seeks affordable housing contribution on sites resulting in a net gain of 5 dwellings within Barry at 30% provision, and 35% provision in Llantwit Major, Rhoose and St Athan. Outside of these settlements current LDP policy requires a 40% affordable housing contribution where the development would result in a net gain of 1 dwelling, or a net gain of 2 where the development involves the conversion of an existing building.

5.17 Given the nature of these smaller windfall developments, it is difficult to project the number of dwellings that will be delivered through sites, particularly where the affordable housing contribution may be in the form of a commuted sum as will be the case where a single dwelling is proposed. Therefore, a dwelling allowance from this source has not been accounted for within the LDP affordable housing target, however the Council shall monitor affordable housing delivery annually, and shall seek to disaggregate the annual number of affordable housing dwellings by source, i.e., large, and small windfalls and the level of commuted sums received in its annual monitoring report.

5.18 The analysis of affordable housing contributions from sites with permission, existing deliverable LDP allocations, Key Housing Sites and projected windfall sites have the potential of delivering 3,183 dwellings as summarised in Table 17 below. In calculating the affordable housing target, the Council recognise that the number of affordable homes delivered during the plan period could be lower or greater than the target because of site viability, or where sites are brought forward by either the Council, Registered Social Landlord or by the Welsh Government.

**Table 16: Anticipated Affordable Housing Units by Source**

<b>Source</b>	<b>Affordable Dwellings</b>
Number of affordable dwellings delivered April 1 <sup>st</sup> , 2021, to the 31 <sup>st</sup> March 2025	702
Sites with permission and or under construction on April 1 <sup>st</sup> 2025	908
Contribution from rolled forward LDP allocations	222
Contributions from Key and additional housing sites	952
Contributions from Affordable Housing Led Sites	62
Contributions from Large Windfall Developments	224
<b>Total Affordable Units</b>	<b>3,070</b>

## **6 Spatial Distribution of Housing**

- 6.1 The RLDP Strategy sets out the framework for positively managing change up to 2036 to achieve a balance between environmental protection, improving quality of life and ensuring sustainable development. The LDP Strategy seeks to direct housing in the Vale of Glamorgan to the most sustainable locations in accordance with the LDP Settlement Hierarchy. This hierarchy is set out below and shall provide the planning framework for the sustainable distribution and direction of development across the Vale and has been used by the Council in the identification of sites for housing development within the LDP.
- 6.2 The DPM stipulates that the LDP should illustrate how the spatial distribution of housing growth complements the spatial strategy of the plan and its relationship to the settlement hierarchy of the plan, which is set out below. Further details on how the settlement hierarchy has been identified is set out within the RLDP Settlement Appraisal Review Background Paper (2023).

### **Key and Service Centre Settlements:**

Key Settlement: Barry

Service Centre Settlements: Cowbridge, Llantwit Major, Penarth

### **Primary Settlements:**

Dinas Powys, Rhoose, St. Athan, Llandough (Penarth), Sully, Wenvoe, Wick and Culverhouse Cross

### **Minor Rural Settlements:**

Aberthaw (East)	Graig Penllyn	Penllyn
Aberthin	Llancarfan	Peterston Super Ely
Bonvilston	Llandow	Sigingstone
Colwinston	Llanmaes	St Brides Major
Corntown	Llysworey	St Nicholas
Ewenny	Ogmore by Sea	Treoes
Fferm Goch	Pendoylan	Ystradowen

### **Hamlets and Smaller Rural Settlements:**

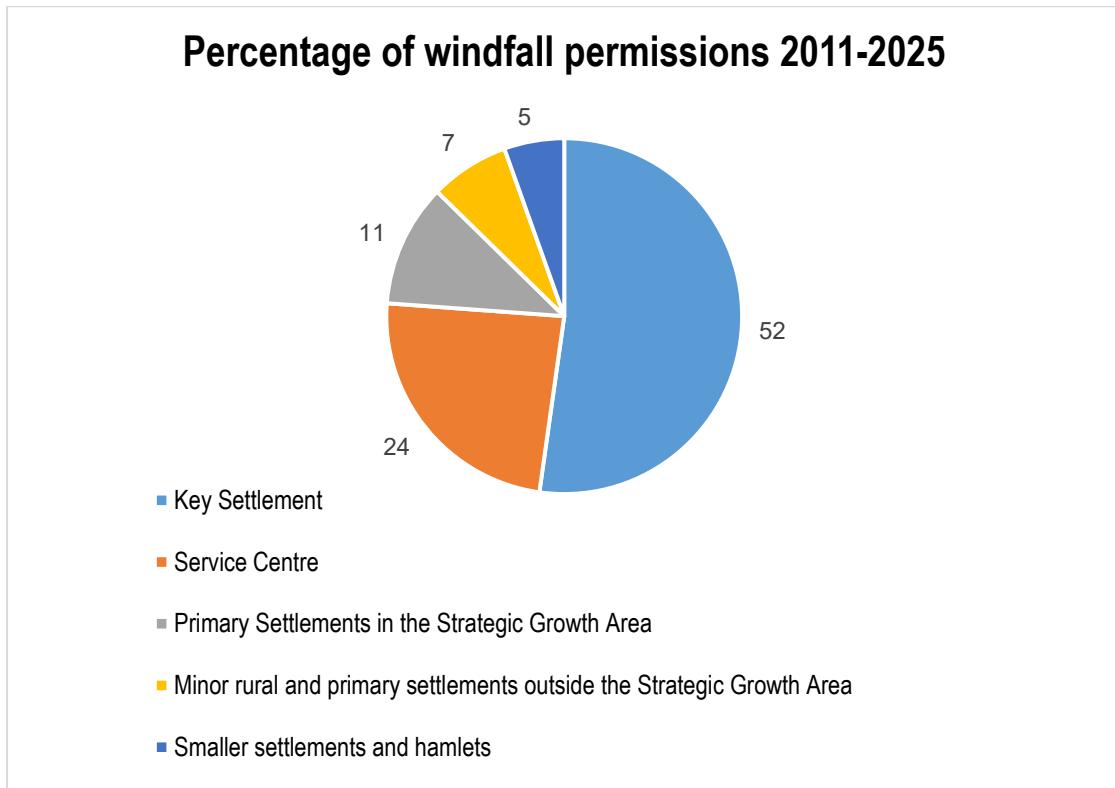
Aberthaw (West)	Llanmihangel	St Brides Super Ely
Broughton	Llansannor	St Donats
Castle Upon Alun	Llantrithyd	St Georges
City	Maendy	St Hilary
Drope	Marcross	St Lythans
Dyffryn	Michaelston le Pit	St Mary Church
Flemington	Monknash	St Mary Hill
Fonmon	Moulton	St Y Nyll
Gileston	Norton	Swanbridge
Gwern y Steeple	Ogmore Village	Tair Onen
Hensol	Pancross	The Downs
Lampha	Penmark	The Herberts
Lavernock	Penn Onn	Tredogan
Leckwith	Pentre Meyrick	Trerhyngyll
Llanbetherwy	Porthkerry	Tre-Dodridge
Llancadle	Ruthin	Twyn-yr-Odyn
Llandough (Cow)	Southerndown	Walterston
Llangan	St Andrews Major	Welsh St Donats

6.3 In respect of future spatial distribution of windfall development, the very nature of such developments makes it difficult to accurately predict the location and amount of windfall development across the settlement hierarchy of the plan period. The Council has therefore utilised past 14-year (2011-2025) windfall development information as a means of distributing small and large windfall allowance across the settlement hierarchy.

6.4 Figure 1 below summarises the spatial distribution of housing on large windfall sites granted planning permission over the 14-year period 2011 to 2025. The sites have been categorised by their position in the RLDP spatial hierarchy. One site, land at Leckwith Quay, which has planning permission for 228 units has been omitted from the calculation as it is a brownfield

redevelopment outside of any defined settlements in the Vale but close to Cardiff's boundary. The inclusion of the site disproportionately skews the figures towards small settlements and hamlets, which are unlikely to form much of the windfall supply in the RLDP so it was deemed appropriate not to include it. The percentages shown in Figure 1 have been used to distribute the windfall allowance for the plan across the RLDP settlement hierarchy.

**Figure 1 - Spatial distribution of windfall permissions**



6.5 Overall, the majority of windfall development is likely to take place in Barry, with 52% of the overall units on windfall sites with permission. This is unsurprising given its position as a Key Settlement. The service centres have approximately a quarter of the permission, with the proportions decreasing as the settlement sizes decrease.

6.6 Whilst the analysis in Figure 1 relates to permissions on large windfall sites, it is the case that smaller sites follow the same pattern, as the level of opportunities for small scale development, including infill and conversions, are more prevalent within larger settlements. The same distribution is therefore also considered appropriate for small windfall sites.

6.7 Table 17 below summarises the spatial distribution of the various components of the housing land supply as they relate to the RLDP Settlement Hierarchy. Appendix 1 provides a list of the existing housing commitments and RLDP allocations by settlement.

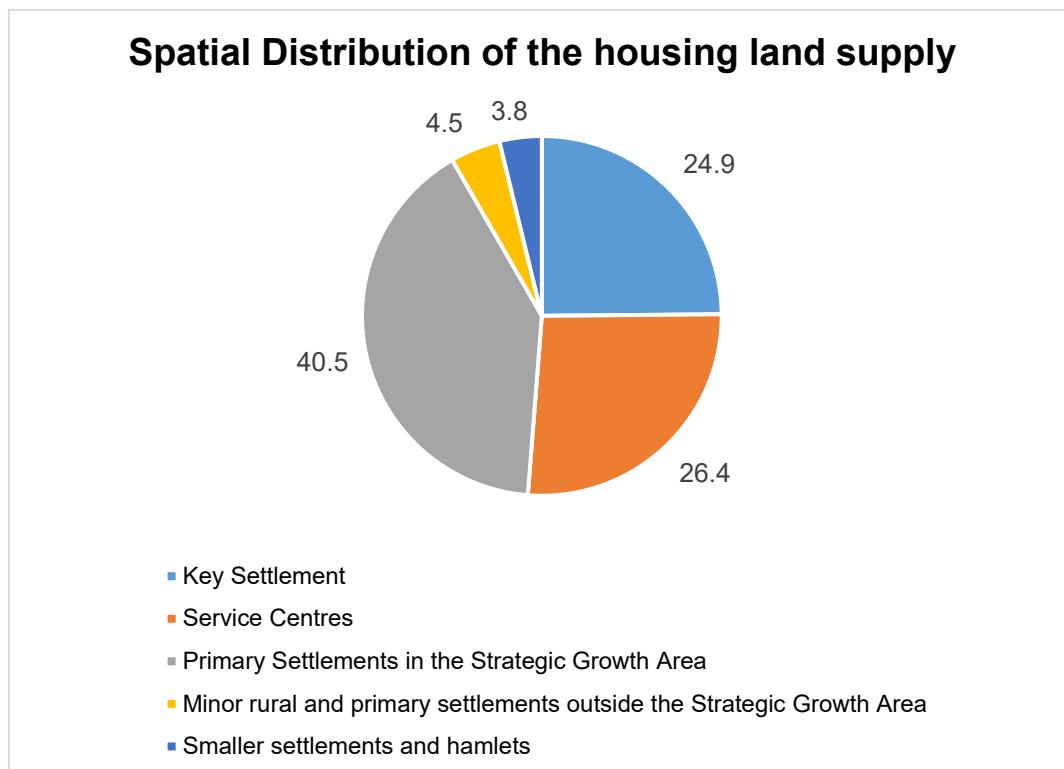
**Table 17: Spatial Distribution of Housing Supply (April 2025)**

Components of Housing Supply		Total	Settlement Hierarchy				
			Key Settlement Barry	Service Centre Settlements	Primary Settlements in Strategic Growth Area	Minor Rural Settlements and Primary Settlements outside of Strategic Growth Area	Hamlets and Smaller Rural Settlements
A	Small Windfall Completions 2021-25	185	70	73	22	15	5
	Large (Windfall) and Allocations Completions 2021-25	1,562	581	394	569	18	0
B	Units under Construction April 2025	313	70	163	63	17	0
C	Units with Planning permission including non delivery allowance	1,777	66	1,004	331	124	253
	Existing land supply	3,837	787	1,634	985	174	258
D	LDP Sites rolled forward	959	200	340	419	0	0
F	Key Housing Allocations	2,278	376	0	1,902	0	0
G	Other allocations including Affordable Housing Led Sites	283	110	0	51	122	0

	Allocated sites	3,520	686	340	2,372	122	0
G	Large windfall sites (10>)	720	376	172	81	52	39
H	Small windfall sites (<10)	583	304	139	65	42	32
	Total Windfall	1303	680	311	146	94	71
I	Total Housing Provision	8,660	2,153	2,285	3,503	390	329

6.8 Figure 2 provides an indication of the spatial distribution of the projected growth over the plan period (based on 8,660 dwellings) by position in the settlement hierarchy.

**Figure 2 – Spatial Distribution of the housing land supply**



6.9 The spatial distribution of the housing land supply in Figure 2 illustrates that the spatial distribution of new housing is being directed in line with the spatial growth strategy (SP1), specifically to the settlements in the Vale that are best served by public transport connectivity and offer a good range of services and facilities. Barry, as a key settlement, is accommodating a significant proportion of new development commensurate with its status in the hierarchy and its credentials as a sustainable settlement well served by sustainable transport.

6.10 The service centre settlements are also accommodating an appropriate share. Whilst the highest proportion of development is identified within the primary settlements within the strategic growth area, it should be noted that there are five settlements within this category – St Athan, Rhoose, Dinas Powys, Llandough and Sully. These are settlements that as well as having good existing and proposed public transport links, are also well served by employment opportunities in proximity, aligning housing with employment. It will be noted that only a small proportion of development is likely to take place outside of the strategic growth area, with some of this development relating to planning permissions granted in accordance with the adopted LDP strategy

## 7 Housing Land Supply Trajectory

- 7.1 In accordance with the Development Plans Manual (DPM), a housing trajectory must be prepared to support the Deposit Plan. The DPM (paragraph 5.66) states "*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.*"
- 7.2 Membership of the Housing Stakeholder Group (HSG) is a matter for each LPA to determine. However, the DPM recommends that it should ideally include relevant LPA departments, home builders, landowners (and agents where appropriate), Registered Social Landlords, statutory undertakers, infrastructure providers, and other appropriate bodies.
- 7.3 The purpose of the HSG is to discuss the timing and phasing of all sites with planning permission or an allocation in the plan.
- 7.4 The DPM is clear that "Small and large windfall site rates/assumptions are not within the remit of the stakeholder group. The LPA should evidence assumptions used to determine these average rates which will form part of the discussion at the examination of the plan. This is the appropriate stage of plan preparation process to challenge such assumptions through representations to the plan, if appropriate."
- 7.5 There is already a HSG in place within the Vale, as the Council consults key stakeholders on past and forecast completions as part of the Annual Monitoring Report process for the adopted LDP. This is normally undertaken by email rather than through an annual meeting.
- 7.6 The Housing Stakeholder Group for the RLDP included the Council's housing department, major housebuilders either currently on site within the Vale or that have proposed allocations within the Deposit Plan, the Home Builders Federation, the Council's partner RSLs, and site promoters, landowners and/or agents representing sites that are either proposed allocations or form part of the existing land supply. In addition, statutory undertakers and the Health Board were also consulted.
- 7.7 Prior to circulating the housing trajectory, the Council liaised with each site promoter to establish their proposed site-specific trajectory. This process was also carried out for the sites that already had planning permission. This ensured that the information that was presented to the HSG was based on the latest evidence.
- 7.8 The draft trajectory and a supplementary paper explaining the components of the housing land supply were circulated to the HSG on 3 October 2025 for a two-week period. The covering email stated that it was considered the most efficient use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts had been developed in consultation with site promoters, including developers and their agents. However, it was made

clear that if matters arose during the consultation that required further discussion, the Council would facilitate a meeting.

7.9 As part of the consultation, 15 responses were received. These are summarised in Appendix 2, alongside the Council's response to the matters raised. The key comments were as follows:

- Support from one stakeholder for the 5% non-delivery allowance, but concerns from another that this differed from the approach set out at Preferred Strategy stage and that other LAs have used a higher figure.
- Support for the 10% flexibility allowance.
- Support for the large windfall assumption from one stakeholder, with another querying whether a longer time period should be used.
- Support for the small windfall assumption.
- Support for the approach taken in establishing a deliverable land bank.
- Concern that the number of units in the land bank has increased compared with the figure identified in the Preferred Strategy.
- Queries about whether any double counting of rolled-forward sites has occurred and whether such sites should be included in the supply.
- Requests for clarity on the planning status of sites.
- Concern that the timescales assumed for pre-application consultation, determination, and discharge of conditions are too short.
- Concern that there is too great a reliance on key sites to deliver the housing requirement.
- Observation that the trajectory indicates a significant step change in delivery, higher than previous rates.
- A query as to whether St Athan can sustain two sites delivering at high levels simultaneously.
- A query about whether correct procedure was followed in allocating sites in the Deposit Plan that were not identified in the Preferred Strategy or that emerged through the second call for sites.
- Concern from one respondent that the consultation period for commenting on the trajectory was too short, and that a meeting should have been held rather than relying on email correspondence.
- Several site promoters expressed support or confirmed they had no comments on the trajectories for their sites.

7.10 Eight of the representations that were submitted were in respect of sites that were not proposed for allocation in the plan. Representations were also received objecting to specific sites proposed for allocation. The Council's response to this is that the purpose of the consultation is to consider the timing and phasing of all sites with planning permission or an allocation in the plan. It is not an opportunity for site promoters to identify other sites for inclusion as allocations or object to the principle of those sites that are proposed.

- 7.11 Following a review of the comments made, it is considered that the approach taken to establish the assumptions in the trajectory has been robust. The assumptions have been determined in accordance with the site promoters. No changes are therefore proposed to the figures within the trajectory at this point.
- 7.12 In response to the comment that further information was needed on the status of specific sites, an additional column has been added to trajectory to provide further detail.
- 7.13 The comments in respect of procedure are noted. It is acknowledged that the HSG was consulted by email rather than a formal meeting being held. However, stakeholders were advised that the Council would have been happy to facilitate a meeting if this was deemed to be necessary. No stakeholders requested a meeting and even the representor that raised concerns about procedure did not indicate that they specifically wanted a meeting to be arranged.

## Appendix 1 - Large Windfall Sites Approved 2011-2025

Site Name	Planning Ref.	Year Approved	Dwellings	Status
Llantwit Major Social Club, Beach Road	2011/01299/FUL	2012	16	Completed
Former Marine Hotel, Barry Island	2013/00778/FUL	2013	20	Completed
Porthkerry Road Methodist Church, Barry	2014/00224/FUL	2014	11	Completed
The Pumphouse, Hood Road, Barry	2014/00920/FUL	2014	15	Completed
Site of former quarry, Leckwith Road, Llandough	2013/00632/FUL	2014	25	Completed
Land west of Bendrick Road, Barry	2013/00936/RES	2014	14	Lapsed
Old Station Yard, St. Athan	2013/01165/FUL	2014	23	Completed
Haydock House, 1, Holton Road, Barry	2013/01249/FUL	2015	15	Completed
Barry Dock Conservative Club	2014/01300/FUL	2015	21	Completed
Mount Sorrel Hotel, Porthkerry Road, Barry	2014/01129/OUT	2015	34	Lapsed
Bryneithin Home for the Elderly, St. Andrews Road, Dinas Powys	2015/00954/OUT	2015	18	Completed
Woodlands Road, Barry	2015/00570/FUL	2015	27	Completed
Former Adult Training Centre, Woodlands Road, Barry	2015/00566/FUL	2015	30	Completed
Land to the south of Craig Yr Eos Avenue, Ogmore by Sea	2015/00016/FUL	2015	20	Completed
67-79 Dochdwy Road, Llandough	2013/01257/FUL	2015	18	Completed
Redwood Close, Boverton, Llantwit Major	2014/00055/FUL	2015	12	Completed
Former Post Office Sorting Office, Llantwit Major	2014/00193/FUL	2015	18	Completed
Land at Pentre Meyrick	2014/00933/FUL	2016	13	Completed
Northcliffe Lodge, Northcliffe Drive, Penarth	2017/00541/FUL	2016	30	Completed
St. Athan Boys Village, St. Athan	2016/00369/OUT	2016	15	Not started

Site Name	Planning Ref.	Year Approved	Dwellings	Status
Chapel Terrace, Twyn Yr Oden, Wenvoe	2015/01228/FUL	2017	15	Completed
Land to the rear of Westgate, Cowbridge	2016/00809/FUL	2017	37	Completed
United Reformed Church, Windsor Road, Barry	2016/00219/FUL	2017	22	Completed
The Highlands, Old Barry Road, Penarth	2016/01142/FUL	2017	11	Completed
Land at Cogan Hill, Penarth	2016/00115/OUT	2017	40	Lapsed
Land at the Rectory, Wenvoe	2015/01129/FUL	2018	12	Completed
Tathan Hall, 6, Rectory Drive, St. Athan	2017/00066/FUL	2018	16	Completed
Provincial House, Kendrick Road, Barry	2018/00092/FUL	2018	32	Completed
St. Pauls Church Hall, Arcot Street, Penarth	2017/01337/FUL	2018	14	Completed
Former RS Garage, Windsor Road, Penarth	2017/00955/FUL	2018	12	Completed
The Goods Shed, Hood Road, The Innovation Quarter, Barry	2018/01358/FUL	2019	11	Completed
Land East of the Goodsheds, Hood Road, Barry	2018/01359/FUL	2019	42	Completed
Land at Subway Road, Barry	2018/01108/FUL	2019	72	Completed
Cwrt Canna, adj. to Llangan Primary School	2018/01231/FUL	2019	13	Completed
Castle Hotel, Jewel Street, Barry	2019/01062/FUL	2019	14	Completed
Sea View Labour Club, Dock View Road, Barry	2019/01061/FUL	2019	28	Completed
The Windsor, 166-170, Holton Road, Barry	2019/01060/FUL	2019	18	Completed
Land at Hayes Road, Barry	2019/00603/FUL	2019	23	Completed
56a, Windsor Road, Penarth	2018/01420/FUL	2019	21	Under Construction
St. Pauls Church and Hall, St. Pauls Avenue, Barry	2018/01383/FUL	2019	31	Completed
Land to the North of Heol Y Pentir, Rhoose	2018/01421/OUT	2019	17	Under Construction

Site Name	Planning Ref.	Year Approved	Dwellings	Status
The Old Rectory, 10-12, Old Port Road, Wenvoe	019/01311/FUL	2020	10	Completed
Colcot Health Clinic, Winston Road, Barry	2021/01444/RG3	2021	12	Completed
81-85, Holton Road, Barry	2021/00622/FUL	2021	25	Under Construction
Dunraven Court, Beach Road, Southerndown	2019/00503/FUL	2021	22	Not started
Land off Gileston Road, St. Athan	2017/01263/FUL	2021	18	Completed
Hensol Castle, Hensol Castle Park, Hensol	2018/00482/HYB	2021	16	Not started
Land to the rear of Nos. 2 to 4, St. Cyres Road, Penarth	2020/01232/RG3	2021	14	Completed
Land at Coldbrook Road East, Cadoxton	2021/01743/FUL	2022	20	Under Construction
Land at St. Brides Road, Wick	2021/01081/FUL	2022	17	Under Construction
Leckwith Quay, Leckwith Road, Leckwith	2020/01218/HYB	2023	228	Not started
Former Railway Sidings, Ffordd y Mileniwm, Barry	2020/00775/OUT	2023	56	Not started
Cadoxton House, Barry	2024/00565/FUL	2024	13	Not started
Darren Hill, Westgate, Cowbridge	2022/0689/REG	2024	50	Not started
Olive Tree Lodge, 2, Port Road East, Barry	2023/00087/FUL	2024	10	Under Construction
Crossway Methodist Church, Court Road, Barry	2024/00230/RG3	2024	15	Under Construction
South Wales Police, Police Station, Westgate, Cowbridge	2023/00826/FUL	2025	14	Not started
		<b>Total</b>	<b>1436</b>	
		<b>Lapsed</b>	<b>88</b>	
		<b>Average windfalls 2011-2025</b>	<b>103</b>	

## Appendix 2 - Vale of Glamorgan Housing Trajectory Stakeholder Consultation Responses

Issue/Stakeholder	Stakeholder Response	Council Response
Dwelling Completions	Stakeholder Response	Council Response
No comments were received		
Non-Delivery Assumptions	Stakeholder Response	Council Response
Cardiff and Vale University Health Board	<p>The proposed 5% non-delivery allowance appears reasonable given the Vale's strong historical delivery record. The analysis of past permissions supports a low risk of non-delivery</p>	Support for the approach taken by the Council is welcomed.
Home Builders Federation	<p>HBF notes the 5% non-delivery allowance and the explanation of how it has been chosen. However, the 5% appears in part to be based on which planning permission have lapsed, however planning permission can also be renewed and still not be built, sit part implemented or sit waiting for S106 legal agreements to be signed.</p> <p>HBF also notes in the Council's earlier Housing background paper BP9 no such allowance was made but instead a detail analysis of which sites would and would come forward was made, why has a different approach been taken at this stage? Table 3 of this document identified the excluded three sites and HBF would question are these included in the current calculation?</p> <p>Other LPAs have also allowed a non-delivery rate, but this has been much higher, for example Cardiff deducted 20% for non-delivery</p>	<p>The Development Plans Manual (DPM) Table 18 states that a 'non-delivery allowance' should be based on local evidence and may not be appropriate for all LPAs. It states that understanding the proportion of sites that did not come forward in the past can be useful in this respect. The fact that other LPAs have used higher non-delivery rates is not directly relevant as that decision would have been based on their local evidence. It can be demonstrated that the Vale's non-delivery has been low and the figure of 5% can be justified.</p> <p>The Preferred Strategy version of BP9 referenced three LDP allocations that were not proposed to be carried forward due to concerns over deliverability and conformity with the RLDP strategy. Since BP9 was published one of these sites, Land off Sandy Lane, Ystradgyniad, was subject to a planning application, which was determined against the adopted LDP and approved. This site is now under construction and is included in the land bank as a committed site. The change in status of this site has</p>

		no impact on the non-delivery calculation, which was based on sites with planning permission and the proportion of sites where permission has lapsed.
<b>Flexibility</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Cardiff and Vale University Health Board	The 10% flexibility allowance is adequate to mitigate delivery risks. However, consideration could be given to additional contingency measures, especially in light of economic uncertainties.	Comments are noted. The 10% flexibility is considered to be reasonable based on local evidence and the frontloading of the site assessment process and assessment of viability and deliverable. An extra contingency is in place through the inclusion of an additional non-delivery allowance on sites with planning permission.
<b>Windfall Allowance- Large Windfall</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Cardiff and Vale University Health Board	The windfall assumptions of 80 units/year for large sites are consistent with historical averages and reflect a conservative yet realistic approach.	Support for the approach taken by the Council is welcomed.
Home Builders Federation	HBF consider that it would be more appropriate to use the LDP plan period for the calculation of the windfall figure, as noted in para.21.16 this would result in a figure very similar to that in the Housing paper used to support the preferred strategy, there appears to be no reason to change this approach at this stage in the plan process. It is also the approach used for the small windfall sites.	The Council considers the approach it has taken in calculating the windfall assumptions to be justified.  It should be noted that the DPM states in Para 5.70 " <i>Small and large windfall site rates/assumptions are not within the remit of the stakeholder group. The LPA should evidence assumptions used to determine these average rates which will form part of the discussion at the examination of the plan. This is the appropriate stage of plan preparation process to challenge such assumptions through representations to the plan, if appropriate.</i> "
<b>Windfall Allowance- Small Windfall</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Cardiff and Vale University Health Board	The windfall assumptions of 53 units/year for small sites are consistent with historical averages and	Support for the approach taken by the Council is welcomed.

	<p>reflect a conservative yet realistic approach</p> <p>The exclusion of large windfall allowance in the first two years is appropriate to avoid double counting with existing permissions. This aligns with guidance in the Development Plan Manual.</p>	
Home Builders Federation	<p>HBF supports the use of the data over the plan period and consider the same approach should be used for the large windfall calculation.</p>	<p>The Council considers the approach it has taken in calculating the windfall assumptions to be justified.</p> <p>It should be noted that the DPM states in Para 5.70 “Small and large windfall site rates/assumptions are not within the remit of the stakeholder group. The LPA should evidence assumptions used to determine these average rates which will form part of the discussion at the examination of the plan. This is the appropriate stage of plan preparation process to challenge such assumptions through representations to the plan, if appropriate.”</p>
<b>Land Bank Deliverability – General</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Cardiff and Vale University Health Board	<p>The land bank sites, and new allocations appear deliverable within the plan period, especially given the engagement with developers and promoters.</p>	<p>Support for the approach taken by the Council is welcomed.</p>
<b>Land Bank- Spatial Distribution</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Cardiff and Vale University Health Board	<p>The trajectory reflects a balanced distribution across the Vale's settlements, with strategic growth focussed in Barry, St Athan, and Rhoose.</p> <p>Continued monitoring is recommended to ensure equitable provision and avoid</p>	<p>Support for the approach taken by the Council is welcomed.</p> <p>The comments in respect of monitoring are noted and the Council will continue to liaise with the Health Board as specific sites progress.</p>

	over-concentration in specific areas to reduce impact on infrastructure services e.g. health.	
Taylor Wimpey	<p>The increased reliance of land bank sites to provide +411 more dwellings than previously included at the PS is particularly concerning. The new total of 1,860 dwellings to be delivered through sites that benefit from planning permission or have resolution to grant subject to s106, fails to acknowledge Taylor Wimpey's concerns. Taylor Wimpey previously recommended this figure was reduced from the 1,449 dwellings counted at PS stage.</p> <p>Taylor Wimpey maintains their position that it cannot be assumed that all sites allocated within the Adopted LDP will be delivered, given the on-going deficit in housing delivery experienced in recent years.</p> <p>The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's PS consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:</p> <ul style="list-style-type: none"> <li>• Viability constraints;</li> <li>• Site specific constraints;</li> <li>• Landowner intentions;</li> <li>• Requirements for SAB approval;</li> <li>• Biodiversity net benefit;</li> </ul>	<p>The increase in land bank site since the Preferred Strategy is a result of additional housing sites that have been approved by the authority since the publication of the Preferred Strategy in 2023.</p> <p>In preparing the housing trajectory the Council has undertaken extensive work with site developers to ensure that all sites within the trajectory are viable and deliverable. This includes consideration of viability, site constraints, land owner intentions, biodiversity and SuDs and other drainage requirements.</p> <p>Matters regarding the suitability of these supporting the land supply and housing requirement will be a matter for discussing at the Examination of the plan.</p>
Rolled Forward LDP Allocations	Stakeholder Response	Council Response
Cardiff and Vale University Health	Rolled forward LDP sites should be re-assessed	Comments are noted. The rolled forward sites have

Board	periodically to ensure continued viability and alignment with strategic growth objectives	been subject to reassessment to determine their conformity with the strategy, deliverability and viability.
Home Builders Federation	Rolled Forward LDP sites - it is unclear whether or not there has been double counting of these sites with the sites referenced in the earlier section on Land Bank Commitments (Units with Planning Permission)	The trajectory makes a clear distinction between all elements of the housing land supply to ensure no double counting. This includes omitting the large windfall allowance within the trajectory for in the years 2026-27 and 2027-28 as required by the Development Plan Manual.
Geraint John Planning	<p>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 1,242 no. units have been identified as additional housing allocations, of which 959 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%).</p> <p>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."</p> <p>It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should</p>	<p>In preparing the housing trajectory the Council has undertaken extensive work with site developers to ensure that all sites within the trajectory are viable and deliverable.</p> <p>Matters regarding the deliverability of sites and supply and suitability of housing sites within the RLDP shall be a matter for the Examination of the Deposit Plan.</p>

	<p>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.</p> <p>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.</p>	
<b>Trajectory – General Comments</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Home Builders Federation	I note the comment in the table 'not started' but more useful would be to know at what planning stage the site is at otherwise it's very difficult to comment on the suggested start date, although I note you have spoken to developers/land promoters to obtain this information directly.	Comments are noted. The table to be updated as suggested to include site status.
<b>Timing Assumptions underpinning the Trajectory</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Geraint John Planning	<p>We raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:</p> <ul style="list-style-type: none"> <li>• Time period of pre-application discussions/PAC consultation = 4 months</li> </ul>	The Council has undertaken extensive stakeholder engagement with site promoters include internal and external consultations and has also held non-statutory placemaking consultations with members of the public. Additionally, site promoters have submitted extensive supporting evidence and survey

	<ul style="list-style-type: none"> <li>• Time between submission of planning application and determination = 6 months</li> <li>• Time taken from planning consent to the discharge of relevant conditions to enable site construction = 4 months</li> </ul> <p>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.</p> <p>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.</p> <p>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.</p> <p>It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stage’s pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory.</p> <p>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</p>	<p>work as part of these ongoing discussions, and sites have been the subject of viability testing.</p> <p>Much of this work is generally left to the formal submission of planning application stage, however through this frontloading of evidence it is envisaged that this shall reduce timescales for site promoters and in the Council’s determination of planning applications. The timescales within the draft trajectory is a reflection of the extensive work that has already been undertaken in evidencing the deliverability and viability of sites.</p>
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	the trajectory.	
Home Builders Federation	<p>I suspect if you look at recent large housing applications similar to those in the table the suggested time periods for the pre app, application process and discharge of conditions are not realistic or actually achieved, I'd suggest they should each be increased by several months.</p>	<p>The Council has undertaken extensive stakeholder engagement with site promoters include internal and external consultations and has also held non-statutory placemaking consultations with members of the public. Additionally, site promoters have submitted extensive supporting evidence and survey work as part of these ongoing discussions, and sites have been the subject of viability testing.</p> <p>Much of this work is generally left to the formal submission of planning application stage, however through this frontloading of evidence it is envisaged that this shall reduce timescales for site promoters and in the Council's determination of planning applications. The timescales within the draft trajectory is a reflection of the extensive work that has already been undertaken in evidencing the deliverability and viability of sites.</p>
<b>Housing Trajectory – Types of site</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Geraint John Planning	<p>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.</p> <p>The previously proposed site 'Land at North East Barry' was expected to deliver 900 no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which amounts to 659 no. dwellings. This is some 250 units less than the 900 no. homes that was previously</p>	<p>It is not considered unreasonable that 25% of the total provision is on key sites. These have been subject to robust assessment and, through the additional placemaking stage with extensive supporting information to demonstrate their deliverability.</p> <p>The housing requirement identified at Preferred Strategy stage has not been amended. As the Preferred Strategy was based on a 2023 base date and this current update is based on 2025 base date, there will inevitably be some changes in assumptions, as there have been two years of</p>

	<p>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.</p> <p>This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply. 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.</p>	<p>housing completions in the interim.</p> <p>The affordable housing led sites have been identified to provide an appropriate mix of housing in areas where opportunities for affordable housing are limited. There will be an element of market housing on these sites as well.</p>
<b>Housing Trajectory - Delivery Rate Assumptions</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Geraint John Planning	<p>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.</p> <p>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.</p> <p>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</p>	<p>In preparing the housing trajectory the Council has undertaken extensive work with site developers to ensure that all sites within the trajectory are viable and deliverable.</p> <p>Matters regarding the deliverability of sites and supply and suitability of housing sites within the RLDP shall be a matter for the RLDP Examination.</p> <p>It should be noted that housing delivery will not only be on new allocations – there is a pipeline of sites with planning permission that are anticipated to deliver units in 2027-28.</p>

	<p>approx. 1,000 units per year.</p> <p>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.</p> <p>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.</p>	
<b>Housing Trajectory- Key Sites</b>		
Land at North West Barry (HG1 KS1)	Stakeholder Response	Council Response
Cardiff and Vale UHB	<p>The development falls within the Central Vale Cluster which is made up of 6 GP practices, 5 in Barry and 1 in Sully. It has a population of circa. 65K patients with a mixed urban and rural demographic with some areas of significant deprivation:</p> <ul style="list-style-type: none"> <li>• Court Road Surgery – partially</li> <li>• The Practice of Health – partially</li> <li>• The Waterfront Medical Centre</li> <li>• West Quay Medical Practice</li> <li>• Vale Group Practice.</li> </ul> <p>Vale Group Practice merged with Highlight Park in March 2024 – aim is to offer local resistance. Practice works across 5 sites which may affect sustainability.</p> <ul style="list-style-type: none"> <li>• Expansion opportunities at West Quay and Vale</li> </ul>	Comments are noted.

	<p>Group Practice (Highlight Park site) – scoping required – lack of funding may restrict progress. Welsh Government improvement grants have been suspended.</p> <ul style="list-style-type: none"> <li>• Appetite for growth generally from local practices but lack of capacity in current infrastructure.</li> </ul>	
Taylor Wimpey	<p>Taylor Wimpey emphasises its objection to North West Barry, where it is considered inappropriate at a fundamental level as demonstrated by the site's planning history and significant constraints related to its Green Wedge designation between Barry and Rhoose and potential for detrimental impact to the surrounding highway network. Furthermore, the proposed extension to the site would further encroach into the setting of the Porthkerry Country Park and Knock Man Down Wood Site of Importance for Nature Conservation.</p>	<p>In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for promoters of other sites to comment on or object to the principle of specific sites.</p>
<b>North of Dinas Powys Dinas Powys, off Cardiff Road, Dinas Powys (HG1 KS2)</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Cardiff and Vale UHB	<p>The development falls within the Eastern Vale Cluster which is made up of 3 GP practices based in Penarth and Dinas Powys. Its population is circa 37K (key urban areas are Penarth, Dinas Powys, Llandough and Sully). The Eastern Vale Cluster has the second highest percentage of elderly patients (65+) for a cluster in Cardiff and Vale.</p> <p>This development falls within the boundaries of the following practices within the Eastern Vale cluster:</p> <ul style="list-style-type: none"> <li>• Redlands Surgery</li> </ul>	Comments are noted.

	<ul style="list-style-type: none"> <li>• Penarth Healthcare Partnership</li> <li>• Dinas Powys Medical Practice.</li> </ul> <p>Redlands are citing clinical space issues within the building and inability to expand because of this. The building is now owned by Cardiff and Vale University Health Board. Reconfiguration of premises is being considered.</p> <ul style="list-style-type: none"> <li>• Pressure on existing resources driven by patient demand and expectation.</li> <li>• No current capacity for growth has been identified in Eastern Vale.</li> <li>• Situation has been exacerbated by the delay to the building of a Wellbeing Hub in Eastern Vale as part of the Shaping our Future Wellbeing strategy. The hub is seen as key to maintaining the future of GMS services in Eastern Vale.</li> </ul>	
<b>Land at Readers Way, Rhoose (HG1 KS3)</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Cardiff and Vale UHB	<p>The development falls within the Central Vale Cluster which is made up of 6 GP practices, 5 in Barry and 1 in Sully. It has a population of circa. 65K patients with a mixed urban and rural demographic, with some areas of significant deprivation.</p> <p>This development falls within the boundaries of the following practices within the Central Vale cluster:</p> <ul style="list-style-type: none"> <li>• Vale Group Practice West Quay Medical Centre.</li> <li>• Vale Group Practice merged with Highlight Park in March 2024 – aim is to offer local</li> </ul>	Comments are noted.

	<p>resistance. Practice works across 5 sites which may affect sustainability.</p> <p>Expansion opportunities at West Quay and Vale Group Practice (Highlight Park site) – scoping required – lack of funding may restrict progress. Welsh Government improvement grants have been suspended.</p> <p>Appetite for growth generally from local practices but lack of capacity in current infrastructure.</p>	
<b>Land to the West of St Athan (HG1 KS5)</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Savills – Nick Heard	<p>The housing trajectory for the site reflects that indicated by my client on 29/08/2025 where the first completion date was pushed back from 2027/2028 to 2028/2029. This means that the whole site continues to be shown as being delivered within the RLDP plan period. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.</p>	<p>The support for the housing trajectory as it relates to Land West of St Athan is noted.</p>
Cardiff and Vale UHB	<p>The schemes fall within the Western Vale Cluster which has a total population of circa. 31K patients served by 3 practices working from 7 sites. Western Vale has the largest geographical area of the 9 Cardiff and Vale clusters.</p> <p>There are pockets of deprivation and a relatively aged population. These features represent a unique challenge when providing primary care to the population.</p>	<p>Comments are noted.</p>

	<ul style="list-style-type: none"> <li>• Concerns have been expressed by practices in regard to the increase in population due to local housing development.</li> <li>• There is an appetite for growth from practices and sufficient overall capacity may be achievable but there is a lack of capacity in current infrastructure.</li> <li>• There are concerns that recruitment of appropriate staff for practices will affect capacity.</li> <li>• Llantwit Major and Coastal Vale undertook an extension to their premises to increase capacity in 2023.</li> </ul> <p>These 2 developments fall within the boundaries of the 3 practices within the Western Vale Cluster: Cowbridge and Vale Medical Practice Western Vale Family Practice Llantwit Major and Coastal Vale Practice.</p>	
<b>Land at Church Farm (HG1 KS4)</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Home Builders Federation	Question whether or not St Athan can sustain 80 units a year on two sites at the same time	The housing trajectories of both sites in St Athan have been agreed by both site promoters in the knowledge that there will be more than one market site being built in St Athan at the same time. Both sites will deliver 35% affordable and therefore the total number of units for sale in any given year will be less than 80 per site.
Cardiff and Vale UHB	The schemes fall within the Western Vale Cluster which has a total population of circa. 31K patients served by 3 practices working from 7 sites. Western Vale has the largest geographical area of the 9 Cardiff and Vale clusters. There are pockets of deprivation and a relatively aged population. These features represent a unique challenge when providing primary care to the population.	Comments are noted.

	<ul style="list-style-type: none"> <li>• Concerns have been expressed by practices in regard to the increase in population due to local housing development.</li> <li>• There is an appetite for growth from practices and sufficient overall capacity may be achievable but there is a lack of capacity in current infrastructure.</li> <li>• There are concerns that recruitment of appropriate staff for practices will affect capacity.</li> <li>• Llantwit Major and Coastal Vale undertook an extension to their premises to increase capacity in 2023.</li> </ul> <p>These 2 developments fall within the boundaries of the 3 practices within the Western Vale Cluster: Cowbridge and Vale Medical Practice Western Vale Family Practice Llantwit Major and Coastal Vale Practice.</p>	
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<b>Housing Trajectory - Additional Housing Allocations</b>		
<b>Clive Road St Athan</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Geraint John Planning	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.”	<p>The site was submitted through the first call for candidate sites and published within the candidate sites register. Interested parties had the opportunity to comment on the site as part of the Preferred Strategy consultation.</p> <p>In accordance with the DPM, at Preferred Strategy stage, there is only the requirement to identify key sites and growth areas. The requirement to consult on all allocated sites is at Deposit stage and this is the approach that the LPA have taken in accordance with procedure.</p>
<b>Housing Trajectory- Affordable Housing Led Sites</b>		
<b>General Comments</b>	<b>Stakeholder Response</b>	<b>Council Response</b>

Cardiff and Vale University Health Board	<p>The proposed affordable housing-led sites are a welcome addition and address local needs, particularly in rural communities.</p> <p>The 50%+ affordable threshold is appropriate and should be maintained to ensure meaningful impact.</p>	The support for the inclusion of affordable housing led sites is welcomed.
Land at Heol Fain, Wick	Stakeholder Response	Council Response
Geraint John Planning	<p>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.</p> <p>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.</p> <p>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.</p>	In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for promoters of other sites to comment on or object to the principle of specific sites.
DPP (Agents for site promoter)	No comments.	The site promoter has not raised any concerns on the timing and phasing as shown in the trajectory. This has previously been agreed with them.

<b>Land west of Maendy Road, Aberthin</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Geraint John Planning	<p>'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.</p>	<p>The site was submitted through the second call for candidate sites alongside the Preferred Strategy and published within the second call candidate sites register. The site could not have been included within the Candidate Sites Assessment at Preferred Strategy stage (October 2023) as was not submitted at that stage. The assessment of the site will be published as part of the evidence base for the Deposit RLDP.</p>
Mango Planning (Agents for site promoter)	No comments.	<p>The site promoter has not raised any concerns on the timing and phasing as shown in the trajectory. This has previously been agreed with them.</p>
<b>Land Noth of West Winds Business Park, Fferm Goch</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Geraint John Planning	<p>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.</p>	<p>In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for promoters of other sites to comment on or object to the principle of specific sites.</p>
<b>Land to the East of Colwinston</b>	<b>Stakeholder Response</b>	<b>Council Response</b>
Geraint John Planning	<p>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 Westwind's Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing</p>	<p>In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for promoters of other sites to comment on or object to the principle of specific sites.</p>

	Led Allocation. As such, the inclusion of this site is “unsound.”	
<b>Procedural Consultation</b>	<b>Stakeholder Response</b>	
Geraint John Planning	<p>Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.</p> <p>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.</p> <p>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 3rd October 2025) stating <i>“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”</i></p>	<p>Despite objecting that the consultation period was not sufficient, Geraint John Planning have submitted a number of detailed responses to the housing trajectory which would suggest that the period for submitting comments has been sufficient.</p> <p>The Council has provided an explanation as to why the consultation has been carried out by email rather than a meeting and no other consultees raised concerns about this approach. The covering email sent out to participants stated that if matters were raised that required further discussion, the Council would have facilitated a meeting, but no consultees requested this.</p> <p>The Vale have specifically front loaded the RLDP process and therefore the majority of sites proposed for allocation were identified either as part of the Preferred Strategy or the subsequent Housing Growth in Barry consultation.</p> <p>There are only 5 sites that have not been subject to specific consultation to date, but all were identified through the candidate sites process and have been published within the candidate sites register. It is not considered that the identification of proposed sites for allocation at Deposit stage is ‘late’ in the process, as this would normally be the stage when the majority of allocations are first identified.</p>
<b>Geographic distribution of the</b>	<b>Stakeholder Response</b>	

<b>'new' sites / provision</b>		
Geraint John Planning	<p>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.</p> <p>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.</p>	<p>In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for promoters of other sites to comment on or object to the principle of specific sites.</p> <p>Notwithstanding this, in response to the comments, it should be noted that the sites in question are all in areas where there is evidenced unmet affordable housing need.</p>
<b>Health Infrastructure</b>	<b>Stakeholder Response</b>	
Cardiff and Vale University Health Board	The Health Board is committed to becoming an Integrated Community Care System, working in partnership to deliver more care closer to home through strong partnerships and population-driven planning. Across the Vale of Glamorgan, our primary care professionals working within Clusters note the following demands at present, and expect these demands to increase in line with population growth and change:	Comments are noted.

	<ul style="list-style-type: none"> <li>• Responding to an aging population - multi-morbidities &amp; frailty</li> <li>• Chronic conditions – increasing prevalence, notably diabetes •</li> <li>• Adult mental health – need for improved access to services</li> <li>• Children's mental health and neurodiversity – rising demand for timely support</li> <li>• Secondary care services - long waits increasing pressure on primary and community care</li> <li>• Lifestyle &amp; wellbeing (adults and children) – healthy weight, exercise and preventive measures</li> <li>• Cost of living pressures - increased crisis facing our communities</li> <li>• Social isolation – growing need for community connection and support</li> <li>• Deprivation - disproportionate health inequalities across communities</li> <li>• Prevention and screening - immunisation and screening uptake requires improvement</li> <li>• Dental access - long waits affecting overall health and primary care workload.</li> </ul> <p>Community care services will continue to become an increasingly important part of the Community system, given the policy shift in care from hospitals to community settings.</p> <p>This transition reflects a broader commitment to delivering care closer to home, which is especially important given the increasing healthcare needs of an ageing population</p>	
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	<p>and those individuals living with chronic conditions. As the population continues to grow and age, demand for the full range of Community Service provision, including nursing, reablement, speciality outreach, and health inclusion services, is anticipated to rise significantly.</p> <p>The approach outlined in the draft housing trajectory is evidence-led, balanced and responsive to local delivery trends, noting that projected housing growth will increase demand for the full spectrum of primary and community health services.</p> <p>Our assessment of growth would indicate that there is likely to be a shortfall in health care service capacity to meet these needs, and while primary and community care estate capacity is currently under pressure and may be insufficient to meet both existing and projected demand arising from the LDP and RLDP, there are clear opportunities to address this through strategic schemes, collaborative investment, and innovative service models which we are committed to progressing in partnership.</p> <p>A coordinated approach to respond to growth will be required as we further progress our Integrated Community Care Model, which includes workforce optimisation, maximise integrated/shared community asset (Including capital redevelopment opportunities) and enhanced digital capabilities. We welcome continued engagement as the RLDP progresses to Deposit stage and would be happy to contribute further to discussions.</p>	
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Promotion of previously Submitted Candidate Sites	Stakeholder Response	
Edenstone	Comments submitted in relation to candidate site ID 378 (Land North East of Primary School, Peterston Super Ely)	<p>In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for site promoters to identify other sites for inclusion as allocations.</p> <p>The opportunity to comment on the omission of other sites from the Deposit Plan will be at Deposit stage.</p>
Geraint John Planning	Comments submitted in relation to candidate sites: <ul style="list-style-type: none"> <li>• Land South of A48, Bonvilston (Site ID – 435 &amp; 3857)</li> <li>• Land at Caerleon Road (ref. 3833).</li> <li>• Land at Hazelwood, Ogmore by Sea (Site ID – 386 &amp; 3855).</li> <li>• Land at Ystradownen (Site ID 430)</li> <li>• Three Golden Cups Campsite (Site ID 389)</li> <li>• Glebelands, Llanmaes (Site ID 395)</li> </ul>	<p>In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for site promoters to identify other sites for inclusion as allocations.</p> <p>The opportunity to comment on the omission of other sites from the Deposit Plan will be at Deposit stage.</p>
Taylor Wimpey	Comments submitted in relation to candidate site ID 376 (Phase 3 of Land West of Swanbridge Road, Sully).	<p>In accordance with the DPM, the purpose of this consultation is to consider the timing and phasing of all sites with a planning permission or an allocation in the plan. It is not an opportunity for site promoters to identify other sites for inclusion as allocations.</p> <p>The opportunity to comment on the omission of other sites from the Deposit Plan will be at Deposit stage.</p>

### **Appendix 3 – Housing Trajectory**

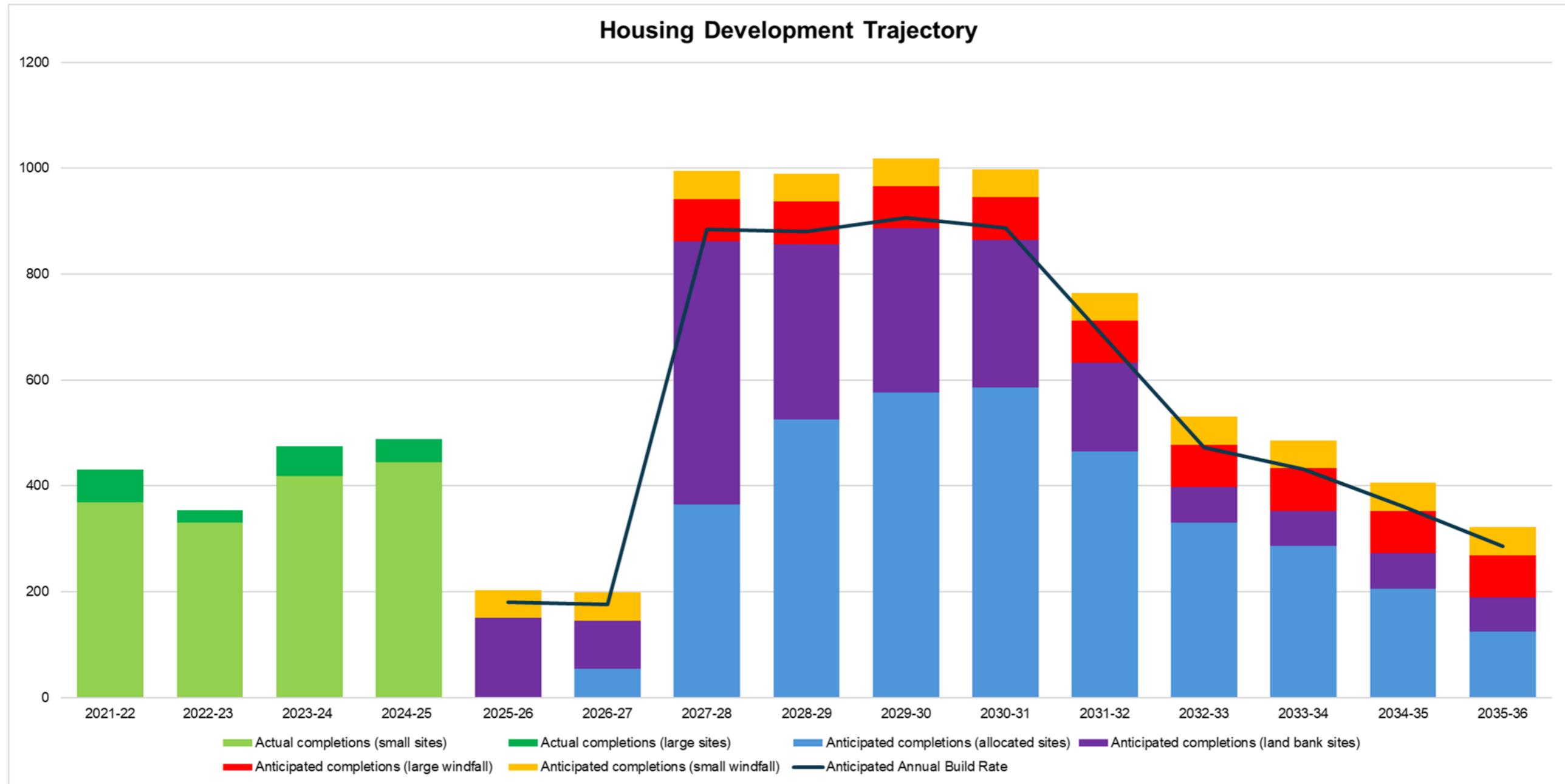
SETTLEMENT TIER	Vale of Glamorgan Housing Trajectory Schedule of Sites for Deposit Plan					Site Status	Total Units Capacity	Units Not Started 1st April 2025	UC April 1st 2025	Time period of pre-application discussions/PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36		
	RLDP KEY SITES	Site Name																							
Barry: Key Settlement	HG1 KS1	Land at North West Barry	No planning permission	376	376	0	4 months	6 months	4 months	0	0	0	30	60	60	60	60	60	60	46	0	0	0	0	
Dinas Powys: Primary Settlement	HG1 KS2	North of Dinas Powys, off Cardiff Road	No planning permission	250	250	0	4 months	6 months	4 months	0	0	0	30	60	60	60	60	60	40	0	0	0	0	0	
Rhroose: Primary Settlement	HG1 KS3	Land at Readers Way	No planning permission	520	520	0	4 months	6 months	4 months	0	0	0	25	75	75	75	75	75	75	75	45	0	0	0	0
St Athan: Primary Settlement	HG1 KS4	Land at Church Farm	No planning permission	532	532	0	4 months	6 months	4 months	0	0	62	80	80	90	80	80	80	80	60	0	0	0	0	
St Athan: Primary Settlement	HG1 KS5	Land to the West of St Athan	No planning permission	600	600	0	4 months	6 months	4 months	0	0	0	40	80	80	80	80	80	80	80	80	80	80	80	
		Total Key Sites		2278	2278	0				0	0	62	205	355	365	355	355	335	275	201	125				

SETTLEMENT TIER	ADDITIONAL RLDP HOUSING ALLOCATIONS	Site Name	Site Status	Total Units Capacity	Units Not Started 1st April 2025	UC April 1st 2025	Time period of pre-application discussions/PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36
Barry : Key Settlement	HG1 (1)	Land to the west of Pencoedtre Lane	No planning permission	135	135	0	4 months	6 months	4 months	0	0	15	40	40	40	0	0	0	0	0
Barry : Key Settlement	HG1 (2)	Land at the Mole	Planning application awaiting determination	65	65	0	NA	Planning application awaiting determination	4 months	0	0	35	30	0	0	0	0	0	0	0
Barry : Key Settlement	HG1 (3)	Land at Hayes Lane	No planning permission	70	70	0	4 months	6 months	4 months	0	0	0	15	25	30	0	0	0	0	0
Barry : Key Settlement	HG1 (4)	Land at Neptune Road	Planning permission under consideration	40	40	0	4 months	6 months	4 months	0	0	40	0	0	0	0	0	0	0	0
Llantwit Major:Primary Settlement	HG1 (5)	Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)	No planning permission	235	235	0	4 months	6 months	4 months	0	0	0	35	45	45	45	45	20	0	0
Cowbridge: Service Centre	HG1 (6)	Land adjoining St Athan Road, Cowbridge	Planning application awaiting determination	105	105	0	NA	Planning application awaiting determination	5 months	0	0	5	20	25	25	30	0	0	0	0
St Athan:Primary Settlement	HG1 (7)	Former Stadium Site, adjacent to Burley Place	Planning application awaiting determination	80	80	0	NA	Planning application awaiting determination	4 months	0	0	30	50	0	0	0	0	0	0	0
St Athan:Primary Settlement	HG1 (8)	Land south of Clive Road	No planning permission	51	51	0	4 months	6 months	4 months	0	0	21	30	0	0	0	0	0	0	0
Rhroose: Primary Settlement	HG1 (9)	Land north of the Railway Line (East)	Planning application awaiting determination	339	339	0	NA	Planning application awaiting determination	4 months	0	35	60	60	60	64	0	0	0	0	0
		Total Additional Housing Allocations		1120	1120	0				0	35	206	280	195	200	139	45	20	0	0

SETTLEMENT TIER	RLDP MAJOR LANDBANK SITES	Site Name	Site Status	Total Units Capacity	Units Not Started 1st April 2025	UC April 1st 2025	Time period of pre-application discussions/PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36
Penarth: Service Centre	HG1 (10)	Land at Upper Cosmeston Farm*	Outline permission subject to s106	576	576	0	NA	NA	NA	0	0	26	45	60	70	75	75	75	75	75
Llantwit Major: Service Centre	HG1 (11)	Land between the Northern Access Road and Eglwys Brewis Road (Site A - Western)	Outline permission subject to s106	140	140	0	NA	NA	NA	0	0	0	15	25	50	50	0	0	0	0
Llantwit Major: Service Centre	HG1 (12)	Land between the Northern Access Road and Eglwys Brewis Road (Site B - Eastern)	Outline permission subject to s106	100	100	0	NA	NA	NA	0	0	0	0	25	35	40	0	0	0	0
Llandough: Primary Settlement	HG1 (13)	Land south of Llandough Hill / Penarth Road	Full permission subject to	133	133	0	NA	NA	NA	0	0	15	25	40	53	0	0	0	0	0
Sully: Primary Settlement	HG1 (14)	Land West of Swanbridge Road (Phase 2)	Outline permission- Full permission awaiting	175	175	0	NA	NA	NA	0	0	35	58	58	24	0	0	0	0	0
		Total Major Landbank Sites		1124	1124	0				0	0	76	143	208	232	165	75	75	75	75

SETTLEMENT TIER	RLDP AFFORDABLE HOUSING LED SITES	Site Name	Site Status	Total Units Capacity	Units Not Started 1st April 2025	UC April 1st 2025	Time period of pre-application discussions/PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36
Colwinston: Minor Rural Settlement	HG7(1)	Land to the East of Colwinston	No planning permission	25	25	0	4 months	4 months	4 months	0	0	0	10	15	0	0	0	0	0	
Aberthin: Minor Rural Settlement	HG7 (2)	Land west of Maendy Road	No planning permission	25	25	0	4 months	4 months	4 months	0	0	0	10	15	0	0	0	0	0	
Wick: Primary Settlement	HG7 (3)	Land at Heol Fain	No planning permission	50	50	0	4 months	4 months	4 months	0	0	0	20	30	0	0	0	0	0	
Fferr Goch: Minor Rural Settlement	HG7 (4)	Land north of West Winds Business Park	No planning permission	22	22	0	4 months	4 months	4 months	0	0	0	22	0	0	0	0	0	0	
				Total Affordable housing led sites	122	122	0			0	0	0	0	62	60	0	0	0	0	0

SETTLEMENT TIER	OTHER LAND BANK SITES	Site Name	Site Status	Total Units Capacity	Units Not Started 1st April 2025	UC April 1st 2025	Time period of pre-application discussions/PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36
Barry: Key Settlement	2021/00622/FUL	81-85, Holton Road, Barry - Former Dan Evans	Under construction	25	0	25	NA	NA	NA	25	0	0	0	0	0	0	0	0	0	0
Barry: Key Settlement	2024/00230/RG3	Land at Coldbrook Road East, Cadoxton	Under construction	20	0	20	NA	NA	NA	20	0	0	0	0	0	0	0	0	0	0
Barry: Key Settlement	2024/00230/REG3	Former Railway Sidings, Ffordd y Mileniwm	Under construction	56	56	0	NA	NA	NA	0	56	0	0	0	0	0	0	0	0	0
Barry: Key Settlement	2023/00087/FUL	Crossway Methodist Church, Court Road	Under construction	15	0	15	NA	NA	NA	15	0	0	0	0	0	0	0	0	0	0
Barry: Key Settlement	2022/0689/REG3	Olive Tree Lodge, 2, Port Road East	Under construction	10	0	10	NA	NA	NA	10	0	0	0	0	0	0	0	0	0	0
Barry: Key Settlement	2023/01140/RES	Cadoxton House	Not Started	13	13	0	NA	NA	NA	0	13	0	0	0	0	0	0	0	0	0
Cowbridge: Service Centre	2018/0240/RES	Land to the north and west of Darren Close	Under construction	475	139	38	NA	NA	NA	0	38	58	58	23	0	0	0	0	0	0
Cowbridge: Service Centre	2018/01408/FUL	Cowbridge Comprehensive 6th Form Block, Aberthin Road	Under Construction	34	0	34	NA	NA	NA	0	34	0	0	0	0	0	0	0	0	0
Cowbridge: Service Centre	2023/00826/FUL	Darren Farm, Westgate	Not Started	50	50	0	NA	NA	NA	0	0	50	0	0	0	0	0	0	0	0
Cowbridge: Service Centre	2024/00565/FUL	Cowbridge Police Station	Not Started	14	14	0	NA	NA	NA	0	0	14	0	0	0	0	0	0	0	0
Penarth: Service Centre	2022/00294/HYB	Land adjacent to Oak Court	Under construction	102	32	70	NA	NA	NA	0	0	70	0	32	0	0	0	0	0	0
Penarth: Service Centre	2018/01420/FUL	56a, Windsor Road	Under construction	21	0	21	NA	NA	NA	0	0	21	0	0	0	0	0	0	0	0
Rhrose: Primary Settlement	2022/00602/RES	Land to the North of Heol Y Pentir	Under construction	15	0	15	NA	NA	NA	15	0	0	0	0	0	0	0	0	0	0
St Athan:Primary Settlement	2022/00452/RES	St. Athan Boys Village	Not Started	15	15	0	NA	NA	NA	0	0	0	15	0	0	0	0	0	0	0
St Athan: Primary Settlement	2022/00266/RES	Land at Higher End St Athan (Phase 2)	Not Started	25	25	0	NA	NA	NA	0	0	25	0	0	0	0	0	0	0	0
St Athan: Primary Settlement	2019/01408/RES	Land to the east of Eglwys Brewis Rd	Under Construction	253	0	10	NA	NA	NA	10	0	0	0	0	0	0	0	0	0	0
Sully: Primary Settlement	2019/00111/RES	Land West of Swanbridge Road, Sully	Under construction	325	0	38	NA	NA	NA	38	0	0	0	0	0	0	0	0	0	0
Wick: Primary Settlement	2021/01081/FUL	Land at St. Brides Road	Under construction	17	0	17	NA	NA	NA	17	0	0	0	0	0	0	0	0	0	0
Bonvilston: Minor Rural Settlement	2015/00960/FUL	Land to the east of Bonvilston	Site stalled - new developer	120	80	0	NA	NA	NA	0	0	25	35	20	0	0	0	0	0	0
Ystradown: Minor Rural Settlement	2023/00948/FUL	Land off Sandy Lane (Phase 2)	Not Started	46	46	0	NA	NA	NA	0	0	16	30	0	0	0	0	0	0	0
Southerndown: Other Settlement	2019/00503/FUL	Dunraven Court, Beach Road	UC-minor works commenced	22	22	0	NA	NA	NA	0	0	22	0	0	0	0	0	0	0	0
Hensol: Other Settlement	2022/01220/FUL	Hensol Castle, Hensol Castle Park	Not Started	16	16	0	NA	NA	NA	0	0	0	10	6	0	0	0	0	0	0
Leckwith: Other Settlement	2020/01218/HYB	Leckwith Quay	Not Started	228	228	0	NA	NA	NA	0	0	28	50	50	50	50	0	0	0	0
				1917	736	313	NA	NA	NA	150	141	329	198	131	50	50	0	0	0	0



YEAR	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2021-2036
Actual completions (small sites)	369	331	418	444	0	0	0	0	0	0	0	0	0	0	0	1562
Actual completions (large sites)	62	23	56	44	0	0	0	0	0	0	0	0	0	0	0	185
Anticipated completions (allocated sites)	0	0	0	0	0	55	365	525	576	586	465	331	286	206	125	3520
Anticipated completions (land bank sites)	0	0	0	0	150	90	497	332	310	279	167	67	67	67	64	2090
Anticipated completions (large windfall)	0	0	0	0	0	0	80	80	80	80	80	80	80	80	80	720
Anticipated completions (small windfall)	0	0	0	0	53	53	53	53	53	53	53	53	53	53	53	583
Anticipated Annual Build Rate					180	176	885	880	906	887	680	472	432	361	286	
					203	198	995	990	1019	998	765	531	486	406	322	



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