

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

Volume 10 – Full Representations on the Draft Healthy Placemaking Supplementary Planning Guidance

August 2026



Introduction to Representations Register

This Representations Register provides a copy of the duly made representations received in response to the Deposit Replacement Local Development Plan (RLDP) public consultation, which took place between 28 January 2026 and 11 March 2026. It has been published in accordance with Regulation 19 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

The Register does not include representations that were not duly made, namely those submitted outside the consultation period or submitted anonymously or without contact details. It also excludes representations that have been withdrawn.

Due to the high number of duly made representations received (over 2,700), it has been necessary to divide the Register into volumes arranged in the order that the policy or proposal appears in the RLDP. Where more than one representation was received on the policy, this has been arranged by representation number.

Volume 1 provides a summary of all representations.

Volumes 2 to 6 contain the full text of representations relating to the Plan itself.

Volumes 7 to 12 contain representations relating to other parts of the evidence base.

The Volumes are as follows:

- Volume 1 – Summary Representations
- Volume 2 – Full Representations on Introduction, Policy Context, Key Characteristics, Themes, Vision and Objectives and Sustainable Growth Strategy and consultation process
- Volume 3 – Full Representations on the Policy Framework (Excluding Key Sites and Housing Allocations)
- Volume 4 - Full Representations on Key Sites (HG1 KS1-KS5)
- Volume 5 – Full Representations on Housing Allocations (HG1, HG2, HG3, HG4)
- Volume 6 – Full Representations on Appendices
- Volume 7 – Full Representations on Background Papers
- Volume 8 - Full Representations on the Integrated Sustainability Appraisal and Habitats Regulations Assessment
- Volume 9 - Full Representations on Candidate Sites
- Volume 10 – Full Representations on the Draft Healthy Placemaking Supplementary Planning Guidance
- Volume 11 - Full Representations on the Green Infrastructure Strategy
- Volume 12 – New Site Submissions

Representations are published in the language in which they were originally submitted. Only one representation was received in Welsh, and an English translation has been provided alongside the original Welsh text.

Where representations were submitted by email, representation form, or letter rather than through the online consultation portal, the original submission has been attached. A redacted version of the submission can be downloaded via the link provided under the 'Attachments' heading at the end of the relevant representation.

All representors will have been notified of their individual respondent number, which can be used to help locate specific representations. This number is shown in brackets next to the respondent's name. Each representation also has its own unique reference number, which can be found at the top of the representation.

Please note that if you submitted representations on multiple sections of the RLDP and/or supporting documents, your representation(s) may appear in more than one volume.

Document Element: Consultation Document, Draft Healthy Placemaking Supplementary Planning Guidance

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G support community-led farms, gardens, and growing spaces as a means to improve health, social bonds, and resilience. We believe policy coherence is essential to enable community solutions across health, food, environment and economy. We would like to see integration of diverse food growing spaces into new developments, including small communal areas that communities can own and design. Recognition of community rights to build essential structures, support for varied typologies, and strategic collaboration are vital. Further engagement with SF&G via Lucie Taylor would be appreciated.

Full text:

Farms, gardens, and growing spaces led by and for the community offer a powerful response. When communities take control of and manage spaces together, they can nurture health and well-being, strengthen social ties, connect with nature, build pride in place and increase local resilience.

Communities growing food and reaching their potential, addresses contemporary challenges felt across different government departments - health, food, environment and economic development. SF&G is advocating for greater policy coherence in community-led land use, so that community solutions can go some way to meeting these challenges. SF&G are experts in sharing inspiration and ambitious ideas to push boundaries. We find creative ways to build a better, more connected world that is rooted in community.

Communities growing food is not just about using land for allotments. Community food growing projects and enterprises take many forms and all play a role in addressing the challenges outlined above. From orchards to community kitchen gardens and forest gardens to community supported agriculture farms. They all play a role that have high value.

Wales Community Food Strategy

"Across Wales, there is an extensive and diverse landscape of local food initiatives, delivered by a broad range of organisations. These demonstrate the commitment within communities to respond to pressing social, economic and environmental issues and, in parts of Wales, a thriving local market."

The launch of the Strategy in 2025, saw a Welsh Government commitment to deliver representative, diverse and active local food networks working to increase the number of collaborative community food projects. Their commitment is long term and whole system. There is now a national realisation that infrastructure change is needed and that joined up thinking and policy support is the core foundation to that.

"Transforming a place's food culture and system requires a joined-up strategic approach and long-term collaboration between individuals and organisations across all sectors and levels – from community groups and third-sector organisations to businesses and public bodies."

. We can ask developers to provide space for food growing (it can take many forms), after all, it is not a capital intensive ask. Green spaces provided as part of housing schemes can easily reserve a proportionately sized space for incoming (ripe) communities to come together to grow. The spaces do not need to be allotments or farms if that that is not proportionate to the level of development. What is quite often needed is a small communal area that has no building waste buried underneath, no grass and some topsoil. No need for tall fences or costly infrastructure- maybe just a small sign advising 'communal space to grow food'. The community need to 'own' the space and grow what they like on it in order for it to be used and thrive.

Section 12 on enabling healthy food choices needs refinement. We would prefer to see much more reference to the array of food growing spaces that can be included alongside new development. spaces of differing types can be provided at little cost according to the size of the development. reference to allotments is fine but we need to get developers to move away from thinking that their site is too small for a community food growing space. there are so many possibilities in terms of typology, size, layout, location. it is important for communities to be given the opportunity to buy in to the space and design it the way they want. We have seen many examples of capital intensive infrastructure being brought into sites where communities have not been involved in the layout design. these spaces, too often, fail. providing healthy environments is about providing potential spaces for communities to come together outdoors. perhaps with a proportionality sized growing space with a small shelter adjacent so volunteers can shelter from the elements, eat drink and socialise while growing food.

We would also like to see recognition of part 6a of the Schedule 2 Part 6 of the GDPO which allows for communities to build essential structures on community growing spaces. perhaps some supportive text for other essential structures could go along side this.

Note -

Social Farms & Gardens

Social Farms & Gardens is the UK-wide network of community farms, gardens and growing spaces. Our vision is to see people and communities reaching their full potential through food growing and nature-based activities as a part of everyday life. Our mission is to improve the health and wellbeing of individuals, communities and the environment through food growing and nature-based activities.

Together, we empower people to take on land and transform it into spaces that boost health and well-being, social connection, improve equitable access to nature and build resilience.

We believe every community deserves an outdoor space and activities that connect people with place and nature.

Together, we can improve our well-being, build equity, foster climate resilience, and tackle the many interconnected challenges we all face. Food growing is a conduit for all these positive outcomes.

Social Farms & Gardens (SF&G) currently manages 15 projects across Wales. Having operated in Wales since 2008, we have supported thousands of community food growing projects and farmers to come together to grow, improve nature, enhance physical and mental wellbeing, reduce food poverty and to move away from our reliance on fragile long supply chains.

This response is provided by The Community Land Advisory Service Cymru which is a programme managed by SF&G. It has been funded in Wales since 2013 (and by Welsh Government since 2018) to provide land and planning advice to community led green space projects and farms.

This being a busy time of year for us, we have struggled for time to respond to this consultation in detail. We would greatly appreciate the opportunity for further engagement via Lucie Taylor the Coordinator of our Community Land Advisory Service in Wales. She is a planner and is currently working with Public Health Wales colleagues and the sustainable food places officer for the Vale on this area of work. lucie@farmgarden.org.uk Many thanks.

Attachments: None

6713**Support**

Document Element: Consultation Document, Draft Healthy Placemaking Supplementary Planning Guidance

Respondent: Cardiff and Vale University Health Board (Rebecca Lewis, Executive Director of Public Health)
[2708]

Summary:

Section 5.24 Suggestion to re-word the section relating to Good Food and Movement (GF&M) to match the description of the GF&M plan:

"The Good Food and Movement Framework (2024-2030) sets out where, in Cardiff and the Vale of Glamorgan, we will prioritise our collective efforts and how we will work together to create change; in the environment, across our settings and in our communities. It has been shaped locally by a wide range of ideas, perspectives and voices and describes how, together we will create environments, settings and opportunities that enable good food and movement for everyone in Cardiff and the Vale of Glamorgan."

Section 6.7 Table does not include checklist and criteria for when a comprehensive HIA is required (as described in 7.2).

Section 7.7 Re-word from 'encouraged' to 'expected'. We would like to see a requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

Section 7.18 Suggestion to include the following information: "Provide meaningful community engagement - actively seek to engage with a range of citizens, especially those who may be directly impacted (adjoining streets and areas), using accessible and clear materials, resources and language. Provide engagement opportunities in a place and time accessible to the community."

Section 7 (general comment): consider how the quality of the HIA will be assessed by the council, as part of effectively implementing the requirements for HIAs.

Section 9.4: Research shows that many teenage girls, young women and gender diverse young people do not feel welcome, comfortable or safe in parks or that they have a place to play <https://committees.parliament.uk/writtenevidence/153636/pdf>.

Therefore, along with children and young people needing free, inclusive and accessible spaces for high quality plan and informal recreation opportunities, also consider advocating for such spaces to be designed for and to work better for young girls and teenage girls, to positively impact this cohort.

Section 13: CAVUHB Primary, Community and intermediate Care and Strategic Planning have previously commented on access to healthcare and community facilities - please refer to the 'BP37 Primary, Community and Intermediate Health Care' for more detail.

General comment:

Whilst there is a focus on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multi functional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement. Suggestion to include wording below to support multi-functional green infrastructure consistent with placemaking principles: "Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure."

Full text:

Section 5.24 Suggestion to re-word the section relating to Good Food and Movement (GF&M) to match the description of the GF&M plan:

"The Good Food and Movement Framework (2024-2030) sets out where, in Cardiff and the Vale of Glamorgan, we will prioritise our collective efforts and how we will work together to create change; in the environment, across our settings and in our communities. It has been shaped locally by a wide range of ideas, perspectives and voices and describes how, together we will create environments, settings and opportunities that enable good food and movement for everyone in Cardiff and the Vale of Glamorgan."

Section 6.7 Table does not include checklist and criteria for when a comprehensive HIA is required (as described in 7.2).

Section 7.7 Re-word from 'encouraged' to 'expected'. We would like to see a requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

Section 7.18 Suggestion to include the following information: "Provide meaningful community engagement - actively seek to engage with a range of citizens, especially those who may be directly impacted (adjoining streets and areas), using accessible and clear materials, resources and language. Provide engagement opportunities in a place and time accessible to the community."

Section 7 (general comment): consider how the quality of the HIA will be assessed by the council, as part of effectively implementing the requirements for HIAs.

Section 9.4: Research shows that many teenage girls, young women and gender diverse young people do not feel welcome, comfortable or safe in parks or that they have a place to play <https://committees.parliament.uk/writtenevidence/153636/pdf>.

Therefore, along with children and young people needing free, inclusive and accessible spaces for high quality plan and informal recreation opportunities, also consider advocating for such spaces to be designed for and to work better for young girls and teenage girls, to positively impact this cohort.

Section 13: CAVUHB Primary, Community and intermediate Care and Strategic Planning have previously commented on access to healthcare and community facilities - please refer to the 'BP37 Primary, Community and Intermediate Health Care' for more detail.

General comment:

Whilst there is a focus on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multi functional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement. Suggestion to include wording below to support multi-functional green infrastructure consistent with placemaking principles: "Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure."

Attachments:

Email Representation - Redacted - <https://valeofglamorgan.oc2.uk/a/4tr>

6777

Object

Document Element: Consultation Document, Draft Healthy Placemaking Supplementary Planning Guidance

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.

For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.

As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.

Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.

The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics**Settlement Pattern**

In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.

Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".

The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need

In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives**Key Themes**

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the

proposed offer.

In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.

Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision

In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised. The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.

In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.

Objective 4 – Placemaking

As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.

Objective 8 – Promoting Active and Sustainable Travel Choices

Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.

Section 5: Sustainable Growth Strategy

RLDP Sustainable Growth Strategy comprises six key elements as follows:

1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).

In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.

Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.

Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.

Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.

In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within

the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.

From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.

Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.

As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.

Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

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

Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.

Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intention to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.

Tables 1 & 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)

3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.

The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.

Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.

In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.

Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.

By directing development to locations well served by existing bus and rail infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.

Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.

In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP

Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.

Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

Focussing further growth in well-connected, sustainable locations such as Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan

Section 6: Policy Framework

This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.

Strategic and Spatial Choices (Placemaking)

Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.

However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above

an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need. Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR)."

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle

the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.

A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.

Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.

The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Table 4. Extract of Proposed Criteria for HIA Assessments

The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places

Policy SP6 – Housing Requirements

Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy HG1 – Housing Allocations

HG1 KS2 – Land to the North of Dinas Powys

Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.

The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidence base. These principles align with the Council's aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.

Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.

In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.

By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

Unsustainable Location & Poor Connectivity

Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alternative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By

AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)

Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.

Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.

This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.

Policy SP7 – Affordable Housing Provision

In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure

delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives.

Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the

thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insulation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the

policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required. From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermine the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward.

Persimmon Homes’ most pertinent comments on the consultation document are summarised below:

- Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
- Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
- Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale’s position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
- In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
- Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government’s Future Homes Standard (FHS), which is intended to ensure all new homes are “zero-carbon ready” through a consistent national Building Regulations framework.
- Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning

Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

- Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.

Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Attachments:

Email Representation - Redacted - <https://valeofglamorgan.oc2.uk/a/38r>

6910

Object

Document Element: Consultation Document, Draft Healthy Placemaking Supplementary Planning Guidance

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Full text:

1. INTRODUCTION

1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest known as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.

1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:

- Section 3 – The Vale of Glamorgan Key Characteristics;
- Section 4 – RLDP Key Themes, Vision, and Objectives;
- Section 5 – Sustainable Growth Strategy; and
- Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.

1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Settlement Pattern

2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.

2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".

2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437.

This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Need

2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

3. RLDP KEY THEMES, VISION, AND OBJECTIVES

3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.

Key Themes

3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.

3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.

3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.

Vision

3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.

3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.

3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.

Objective 4 – Placemaking

3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.

Objective 8 – Promoting Active and Sustainable Travel Choices

3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is

located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.

3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY

Growth Strategy

4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:

1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).

4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.

4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.

4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.

4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.

4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.

4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.

4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.

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

4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.

4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.

3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.

4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.

4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that

other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.

4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.

4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.

4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.

4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.

4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).

4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.

4.19 Focussing further growth in well-connected, sustainable locations such as Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK

5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.

5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:

- Strategic and Spatial Choices
- Active and Social Places
- Productive and Enterprising Places
- Distinctive and Natural Places

5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.

Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.

5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.

5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a

National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevents opportunities for new sites to come forward as part of the plan-making process and in doing so hinders the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipates 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR)."

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.

5.27 In summary, Barratt Redrow acknowledges the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for "substantial additional growth".

5.31 Barratt Redrow objects to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.

5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.

5.33 Likewise, the site benefits from excellent accessibility to the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.

5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vale's stance that the settlement is "significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge". Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMV agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.

5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.

Policy SP4 - Placemaking

5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.

5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:

5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.

5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.

5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Policy PGD2.

5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

Policy PGD1 – Creating Well Designed and Inclusive Places

5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.

5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.

5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements

Policy HG1 – Housing Allocations

Policy HG1 (B) – Housing Allocations

- HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

- 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

- 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.

-

Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

- 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alternative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

- 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

- 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

- 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land

and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
- 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at which housing is able to come forward.
- 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
- 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
- 5.65 Although we do not necessarily dispute this site's progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
- 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
- 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.

- HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
- HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place

Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
- 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
- 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
- 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing

land supply should delays arise on this allocation.

- 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
- 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
- 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
-
- HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
- 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
- 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
- 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
- 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
- 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
- 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
-

Policy SP7 – Affordable Housing Provision

'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
- 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site...'.
 - 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the

policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.

- 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
- 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
- 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
- 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
-

Policy SP8 – Affordable Housing Requirements

Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
- 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
- 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
- 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
- 5.92 The proposed step change in standards from 1 April 2030 – particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year – represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
-

Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and

makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4). Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.

- 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
- 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
- 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
- 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:

Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:

- i. Space heating demand less than or equal to 40kWh/m²/year;
- ii. Energy use intensity less than or equal to 75kWh/m²/year; and Vale of Glamorgan Deposit Plan Representations | SwN Y Coed, Wenvoe – Site 437

- 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
- 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
- 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
- 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
- 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
- 5.103 For completeness SwN Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.

Developments that secure a planning permission from 1st April 2030 onwards will require:

- i. Space heating demand less than or equal to 15kWh/m²/year;

ii. Energy use intensity less than or equal to 40kWh/m²/year; and
 Policy SP13 - Community Infrastructure and Planning Obligations
 Policy CI1 – Open Space Provision

Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
- 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
- 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewster Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGVLS614) and St Nicholas and Bonvilston Ridge Crest (VLFGVLS271), both evaluated as High.
- 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
- 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGVLS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
- 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
- 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
- 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
- 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
-

Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
- 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
- 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
- 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
- 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
- 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
- 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
-

Policy DNP2 – Green Wedges

- Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
 - More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
 - Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
- Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
- 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
- 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
- 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
- 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
-

Policy DNP8 – Severn Estuary Recreational Pressure

SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
- 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
- 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
- 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
- 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
-

MIN1 - Development in Minerals Safeguarding Areas

- Criterion 1: Prior extraction of economic minerals prior to development
- Criterion 2: Demonstrating extraction would have unacceptable impact

- a) Ambient noise levels,
- b) Air quality,

- c) Ground vibration and air overpressure from blasting,
- d) Limited site access/egress onto the Old Port Road would be problematic, and
- e) Increased traffic generation by HGVs.
- Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
-
- Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
- 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
- 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
- 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
-

Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
- 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
- 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
- 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
-

CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

- 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
- 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
- 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
-

6. CONCLUSION

- Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
- Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
- Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
- In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt

Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swyn Coed, are necessary to ensure the RLDP is able to effectively meet

Vale of Glamorgan Deposit Plan Representations | Swyn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

- Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
- Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
- From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Attachments:

Email Representation - Redacted - <https://valeofglamorgan.oc2.uk/a/3ch>